

Virgin Australia Group | FY25 Modern Slavery Statement

# Towards a fairer future



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## Acknowledgement of Country

Virgin Australia acknowledges the Traditional Custodians of the lands, seas and waterways on which we fly and work. We recognise their spiritual, ongoing connection to Country and Community, and extend our deepest respects to Elders past and present.



## Reporting instances of modern slavery

We value transparency and open communication at Virgin Australia. Every voice matters here, which is why we have our Speak Up program. This makes us stronger and creates an environment in which we can all thrive. Everyone who works for Virgin Australia has a responsibility to speak up and leaders have a responsibility to act when concerns are raised. We don't tolerate retaliation – ever.

Concerns can be raised in multiple ways, including via line managers, the People team, the Ethics and Compliance or Legal teams, or via our Ethics Hotline, which is an independently managed, confidential online and telephone service, available 24/7. This includes concerns relating to potential modern slavery or other labour rights harm.

This service is also available for use by third parties, such as our customers, suppliers and members of the community. Anonymous concerns can be raised. All concerns are registered by the independent organisation, then passed to the Virgin Australia Ethics and Compliance team for a response and, if appropriate, an investigation.

### Our Ethics Hotline:

**Australia:** 1800 829 466 (free call)

**New Zealand:** 0800 934 742 (free call)

**International:** +61 3 9278 1017

**Text:** +61 499 221 005

**Web:** [www.rightcall.com.au/ethicsline](http://www.rightcall.com.au/ethicsline)

# A message from the CEO

At Virgin Australia, we are committed to operating responsibly, with integrity, and in a manner that respects internationally recognised human rights. This includes taking proactive steps to identify and manage modern slavery risks across our operations and supply chain.

I am pleased to present Virgin Australia's FY25 Modern Slavery Statement - my first as CEO. Over the past year, we have made meaningful progress in enhancing our modern slavery risk management approach. This includes:

- enhancing our supplier risk assessment and management processes;
- delivering targeted training to our Procurement and Product teams; and
- updating our response protocol for potential or actual incidents of modern slavery across our operations and supply chain.

These actions reflect our commitment to continuous improvement and our responsibility to respect human rights across all areas of our business.

We understand that modern slavery is a complex issue that no single organisation can solve alone. That's why we've continued to collaborate with our peers across the aviation sector in Australia and New Zealand, while deepening our engagement with key

government departments. These partnerships are essential to building shared knowledge, strengthening risk management processes and driving systemic change.

This reporting period marks a significant chapter in Virgin Australia's journey, with our relisting on the Australian Securities Exchange (**ASX**) representing a major milestone for the business. As we continue to grow and evolve, so too does the landscape in which we operate, including the modern slavery environment. The appointment of Australia's first Federal Anti-Slavery Commissioner and the government's response to the independent review of the *Modern Slavery Act 2018* (Cth) reflect a growing national focus on addressing modern slavery risks. We are closely monitoring these developments to ensure we are well-positioned to respond to any future regulatory changes. As a newly listed company, we also recognise the ongoing interest from investors in how companies manage their modern slavery risks.

I am proud of what our team has achieved during this reporting period. As outlined in this Statement, we have made progress across all pillars of our Modern Slavery Framework. At the same time, we acknowledge that there is always more to do. We remain committed to evolving our policies and practices, and to strengthening our relationships with our key stakeholders as we work together to address the complex and evolving challenge of modern slavery.



**Dave Emerson**  
Chief Executive Officer and  
Managing Director, Virgin Australia



# About this Statement

## Purpose of this statement

Virgin Australia recognises modern slavery risk as a complex global human rights issue. As a stakeholder in the aviation industry, Virgin Australia understands the critical role that it and other businesses must play in helping to combat this issue.

## Preparing this statement

This joint Modern Slavery Statement (**Statement**) is made under the *Australian Modern Slavery Act 2018* (Cth) (**Act**). It sets out the actions taken by Virgin Australia Holdings Limited (**VAH**) and Virgin Australia International Holdings Pty Ltd (**VAIH**) and each of the entities that they own and control (including the reporting entities listed in Annexure One) to assess and address modern slavery risks in our operations and supply chain during the year ended 30 June 2025 (**FY25**).

The information set out in this Statement is provided as a consolidated description of VAH and VAIH on their own behalf and on behalf of each of the reporting entities set out in Part A and Part B of Annexure One and for the purposes of this Statement, together referenced as the “Virgin Australia Group”, “Group” or “Virgin Australia”.

## Consultation and approval process

The Virgin Australia Group is comprised of two separate corporate groups with different governing Boards:

- The Board of VAH is the principal governing Board of VAH and its subsidiaries; and
- The Board of VAIH is the principal governing Board of VAIH and its subsidiaries.

Although the two corporate groups have separate governing Boards, together VAH and VAIH’s businesses are managed as an integrated group with a centralised functional management structure and overarching policies, systems and processes that are applied consistently across their respective operations.

This Statement was prepared in consultation with the reporting entities and their owned or controlled entities. This consultation was led by the centralised functional management structure that applies to each reporting entity and each owned or controlled entity. The consultation involved key teams that work together across our business to mitigate and manage modern slavery risks, and also included the Sustainability Steering Committee (**SteerCo**), which

works across all Group entities to address the Group’s response to modern slavery through its Modern Slavery Framework. The Sustainability SteerCo is comprised of members from across the Commercial, Corporate Affairs, Sustainability, People and Culture, Ethics and Compliance, Legal, Procurement, Finance, Risk and Corporate Governance teams.

The Statement was reviewed by the Chief Legal Officer whose responsibilities apply across all entities covered by this Statement, and an independent specialist business and human rights advisory firm, and was endorsed by the Sustainability SteerCo, CEO and Executive Leadership Team (**ELT**), before being reviewed and approved by the two governing Boards identified above.

In accordance with the requirements of section 14(2)(d)(ii) of the Act, this Statement was approved by:

- The Board of VAH as the parent entity of the reporting entities set out in Part A of Annexure One on page 28; and
- The Board of VAIH as the parent entity of the reporting entities set out in Part B of Annexure One on page 28.

This Statement is signed by:

- Dave Emerson in his role as Chief Executive Officer and a Director of the Board of VAH on 10 December 2025 and
- Graham Bradley in his role as Chairman of the Board of VAIH on 10 December 2025.



Dave Emerson



Graham Bradley



# Review of key areas of action in FY25

We made further progress during the reporting period in enhancing our modern slavery risk management approach. This work spanned across all key pillars of our Modern Slavery Framework, including governance, risk management, communication, stakeholder engagement and grievance mechanisms, and remediation.



## Strengthened our due diligence approach for offsite contractors

We developed a due diligence framework to help us identify and manage potential modern slavery risks related to our offshore contractors.



## Continued our Supplier Deep Dive Program

We conducted a Deep Dive with a cleaning services supplier that provides services across Virgin Australia's operational sites. Through the Deep Dive process, we were able to gain a deeper understanding of the steps the supplier is taking to assess and address modern slavery risks and also opportunities for us to take further action, including potential future collaboration between Virgin Australia and the supplier.



## Delivered targeted modern slavery training

We delivered targeted training to our Procurement and Product teams. The training content was tailored to these functions, focusing on relevant modern slavery risks, internal and external stakeholder expectations, and how to safely identify and escalate concerns.



## Continued engagement with external stakeholders

We continued our engagement with a range of external stakeholders, including through the Modern Slavery Aviation Forum (**MSAF**) which was established during FY24. During the reporting period, the MSAF met with the Anti-Slavery Commissioner and his team to discuss modern slavery risks within the aviation industry and opportunities for potential collaboration.



## Reviewed and updated our Modern Slavery Incident Response and Remediation Policy

We reviewed our existing Modern Slavery Incident Response and Remediation Policy to strengthen alignment with UN Guiding Principles on Business and Human Rights (**UNGPs**) and developed supporting materials, including a guidance document and decision tree. This Policy provides clear guidance to team members on how to respond to, and remediate where necessary and expected under the UNGPs, reports of actual or suspected instances of modern slavery.

# Progress against our FY24 Commitments

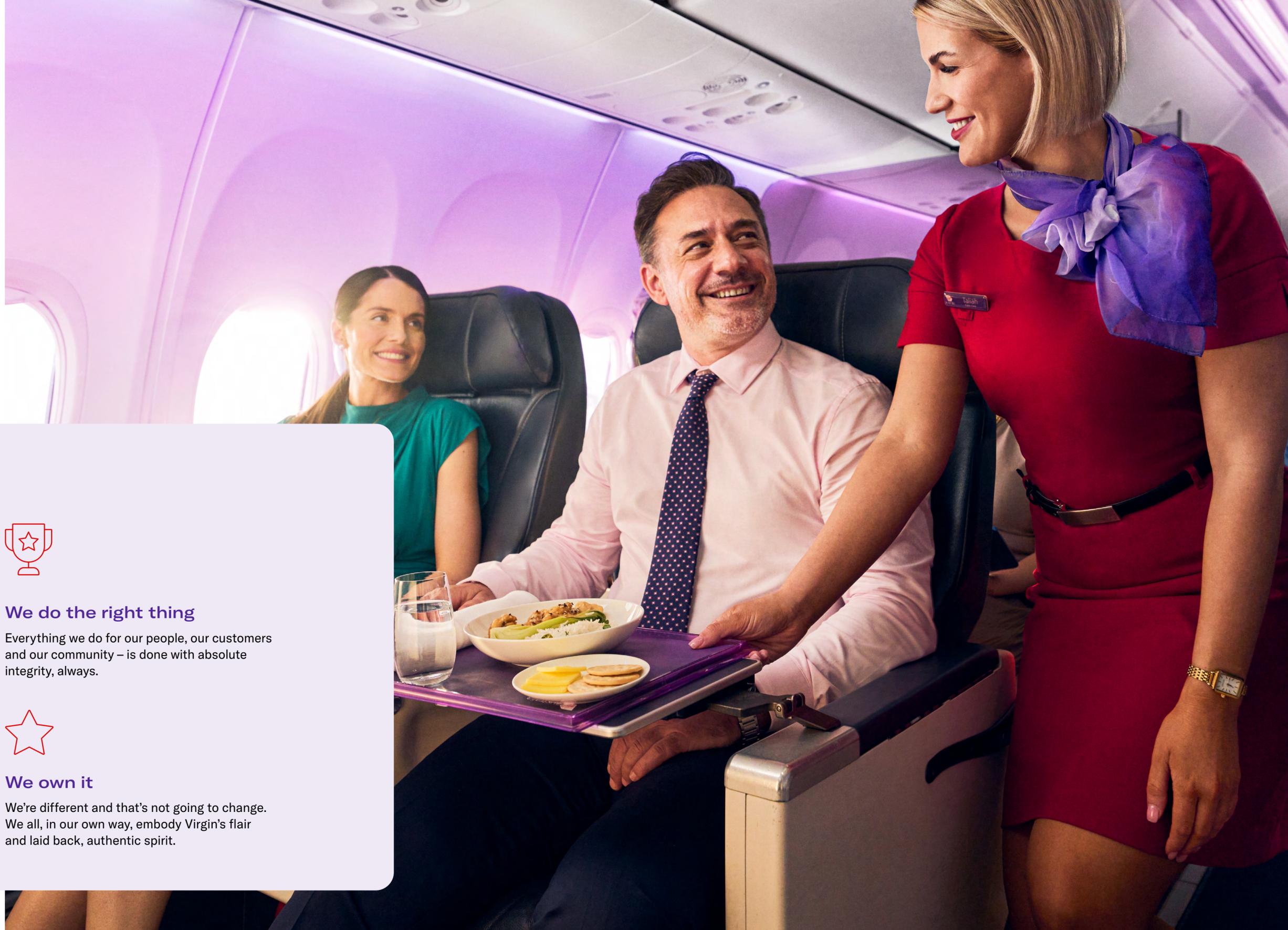
In our FY24 Modern Slavery Statement, we outlined specific commitments across five strategic areas. The following table provides an overview of our progress made during the reporting period:

FY24 Commitment	FY25 Progress	Status
<b>Governance</b>		
Develop an updated Modern Slavery Strategy to guide our risk management approach for the next three years	We focused on refining our overarching Modern Slavery Framework and developing an annual program of work to support the implementation of our Framework. Over the coming reporting period, we will develop a refreshed three-year Modern Slavery Strategy, aligned with any legislative changes resulting from the Australian Government’s consultation on proposed reforms to the Act.	Ongoing 
<b>Management</b>		
Develop and pilot a revised Supplier Deep Dive Program with a high-risk supplier	<ul style="list-style-type: none"> <li>Refreshed our Deep Dive methodology</li> <li>Conducted a Deep Dive with a cleaning supplier</li> </ul>	Complete 
Enhance our processes to better identify and manage modern slavery risks associated with contractors and labour hire providers	<ul style="list-style-type: none"> <li>KO3P 2.0 enhanced with contractor screening</li> <li>Developed a targeted due diligence process for offshore contractors</li> </ul>	Complete 
Review contracting processes for suppliers and update as required to address risk of modern slavery	<ul style="list-style-type: none"> <li>We reviewed our modern slavery contract clauses for all contracts and no material updates were made as it was decided that the approach is still fit for purpose</li> </ul>	Complete 
Deepen visibility and understanding of modern slavery risks in Virgin Australia’s supply chain including updating our “Know Our Third Party” (KO3P 2.0) program	<ul style="list-style-type: none"> <li>KO3P 2.0 successfully launched</li> <li>Technical integration commenced and to be completed in FY26</li> </ul>	Ongoing 
<b>Communication</b>		
Train relevant teams on enhanced processes to address modern slavery	<ul style="list-style-type: none"> <li>Training delivered to all procurement and product teams</li> </ul>	Complete 
Implement revised Supplier Code of Conduct and Supplier Commitments, and develop supporting materials	<ul style="list-style-type: none"> <li>Supplier Code of Conduct and Supplier Commitments updated and Supplier Toolkit developed</li> </ul>	Complete 
Review and refresh external page for suppliers on Virgin Australia’s website	<ul style="list-style-type: none"> <li>Content updated</li> </ul>	Complete 
<b>Engagement</b>		
Continue collaboration with Australian Federal Police (AFP) and establish collaboration with new organisations to develop and highlight awareness of modern slavery and human trafficking	<ul style="list-style-type: none"> <li>Attended all MSAF meetings</li> </ul>	Complete 
<b>Grievance mechanisms &amp; remediation</b>		
Continue to take steps to increase awareness of our Ethics Hotline	<ul style="list-style-type: none"> <li>Multi-channel awareness campaign delivered</li> </ul>	Complete 
Develop process for quarterly testing of Group’s Ethics Hotline functionality and effectiveness	<ul style="list-style-type: none"> <li>Testing protocol established and consistent reporting to the relevant Board committee</li> <li>4/4 quarterly tests completed</li> </ul>	Complete 

# About us

## Our values

Our values shape the way we work, set our standards, and inform every decision we make. They drive our commitment to addressing modern slavery and aim to help us create safe environments for our people, customers and communities.



At Virgin Australia, we have four core values:



### We put safety first

We put the health and safety of our people, customers and communities above all else.



### We have a big heart

Our customers live at the centre of everything we do.



### We do the right thing

Everything we do for our people, our customers and our community – is done with absolute integrity, always.



### We own it

We're different and that's not going to change. We all, in our own way, embody Virgin's flair and laid back, authentic spirit.

# Our structure, operations and supply chain

-  Head office
-  Key operational bases
-  Seasonal Service
-  Short Haul International

## Our structure and operations

Virgin Australia is the country's second-largest airline group, providing domestic and international travel services to millions of customers each year. Virgin Australia operates across three key segments:

**Airlines:** Domestic and short-haul international passenger services, delivered through a fleet of 94 Boeing 737 aircraft across 78 routes and our charter and regional flying from our base in Western Australia through Virgin Australia Regional Airlines (VARA).

**Cargo:** Domestic cargo services utilising available capacity on our regular passenger transport network, handling freight including general cargo and animal transport.

**Velocity Frequent Flyer:** Our loyalty program, which enables members to earn and redeem points across a network of approximately 80 commercial partners and over 300 eStore brands.

Virgin Australia includes several subsidiaries, including the reporting entities listed in Annexure One on page 28.

**657** 

total unique destinations on our global network.

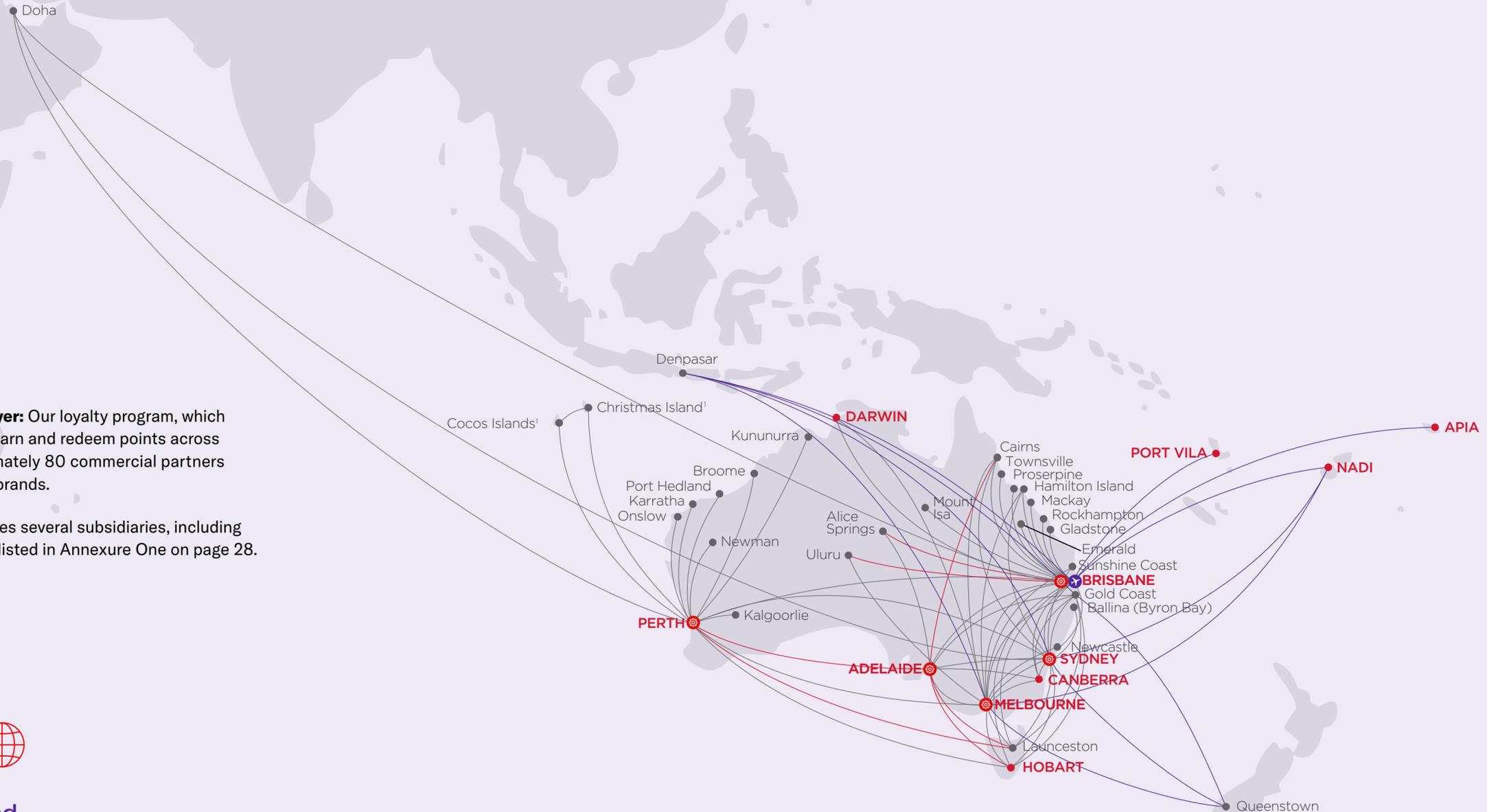
**630** 

global destinations through our Velocity partners and code share partners.

**39** 

domestic and international ports  
33 domestic  
6 international

1. Please note: Virgin Australia Regional Airlines serviced XCH (Christmas Island) and CCK (Cocos (Keeling) Islands) during the FY25 reporting period. These services have since ceased as of the date of publication.



The Virgin Australia Group's head office is in Brisbane, Queensland, Australia and comprises three operating segments.

## 1. Airlines (93% of revenue)

### Virgin Australia Airlines

Through its fleet of 94 Boeing 737 aircraft, Virgin Australia Airlines provides both Australian domestic and short haul international services.

**94** Boeing 737 aircraft  **20+** million passengers annually 

**78** routes 

### VARA

VARA operates a fleet of ten aircraft predominantly on charter services across remote and regional Western Australia primarily serving major resources, energy and government clients who require fly-in fly-out (FIFO) services. VARA provides FIFO charter services to major resources, energy and government clients across 19 remote destinations in Western Australia. The fleet is currently transitioning from Fokker F100 and Airbus A320 aircraft to Embraer E190-E2 and Boeing 737 MAX-8 aircraft.

**10** aircraft  **19** remote WA destinations  Providing FIFO charter services to resources sector across

## 2. Cargo

Virgin Australia provides domestic cargo services utilising available capacity on our regular passenger transport network, handling freight including general cargo and animal transport.

## 3. Velocity (7% of revenue)

Launched in 2005 as Velocity Rewards, and relaunched in 2011 as Velocity Frequent Flyer as part of Virgin Australia's broader rebranding, Velocity is the exclusive loyalty program of Virgin Australia. Velocity's program comprises an expanding network of approximately 80 commercial partners and over 300 eStore and Velocity Rewards Store brands in categories spanning retail, financial services and travel.

Velocity's commercial partnerships are subject to Virgin Australia's third-party risk management processes. Where relevant, these relationships are assessed through KO3P 2.0, which includes tailored screening questions for loyalty partners. This approach reflects the distinct nature of loyalty partnerships while ensuring appropriate modern slavery due diligence is undertaken.

Our loyalty program business, Velocity Frequent Flyer, undertakes activities connected to the earning and/or redemption of Velocity Points through a range of partnerships.

**80** commercial partners  **300+** reward brands 

The key operational bases for our regular passenger transport services, cargo and charter services are Brisbane, Melbourne, Sydney, Adelaide and Perth.

These operations are delivered by our **8,000+** employees across Australia. 

We also have a range of functions supporting the various businesses with the Virgin Australia Group. These functions support two key business areas:

**Operational** – which includes Ground Handling, Engineering and Maintenance services, Security, Workplace Health and Safety, Customer Services and Flight training.

**Corporate** – Sales, Marketing, Finance, Treasury, Corporate Affairs, Procurement, People, Technology, Legal, Risk and Compliance.

Most of these functions are situated in Australia, however, we also have corporate and operational support teams comprised of indirect workers hired through third parties.

During the reporting period, we expanded our global network to a total of 657 domestic and international destinations. We serviced 39 of these destinations through our own domestic and short-haul international operations with customers having the choice of a further 630 global destinations through an extensive list of international airline partners including Qatar Airways, Singapore Airlines, United Airlines, All Nippon Airways and Air Canada. Utilising aircraft wet-leased from Qatar Airways, Virgin Australia commenced long-haul flights from Sydney, Brisbane and Perth to Doha during the reporting period, with Melbourne to Doha scheduled to commence in December 2025. During FY25, we shared learnings with select partners on modern slavery risk management approaches, which informed refinements to our own due diligence processes (see page 22).



# Our people

As of 30 June 2025, our workforce consists of 8,148 direct employees and 6,711 indirect workers.<sup>2</sup>

Our direct workforce employment arrangements are covered by an Enterprise Agreement (EA) or by individual contract. Our direct employees hold a mixture of frontline, operational, support and corporate service roles which are located within Australia. Approximately 78% of our employees are covered by an EA and approximately 3% of our employees are covered by an award.

Our operations also include the use of indirect workers engaged via third parties, such as labour hire agencies, to provide services to support the ongoing activities of our operations, including information technology, payroll, member services, baggage services, and for some of our ground handling operations at our international ports and select domestic ports (noting the majority of ground handling at domestic ports is carried out by employees). Indirect worker arrangements include contractors, contingent workers and outsourced labour hire arrangements.

Our indirect workforce operates across multiple locations, with 4,512 people in Australia and 2,199 in locations offshore including, but not limited to, the Philippines, India, Fiji, Indonesia and New Zealand.

As at 30 June 2025	Count	% Total workforce
Direct employees	8,148	55%
Male employees	4,293	53%
Female employees	3,855	47%
EA employees	6,354	78%
Full time employees	5,939	73%
Part time employees	2,055	25%
Indirect workers	6,711	45%

<sup>2</sup> The Group's workforce exceeded 8,000 direct employees by the end of FY25. Note: The table above excludes employees under casual work arrangements.

# Our customers

Our ambition is to be the most loved airline in Australia - by our people, our guests and our owners.

Our customers include leisure, corporate, government and charter travelers, air freight customers and members of our loyalty program Velocity Frequent Flyer.

**20+**   
million passengers

**9,000+**   
tonnes of cargo freight

**78**   
regular passenger transport routes

62 domestic      16 international



# Our supply chain

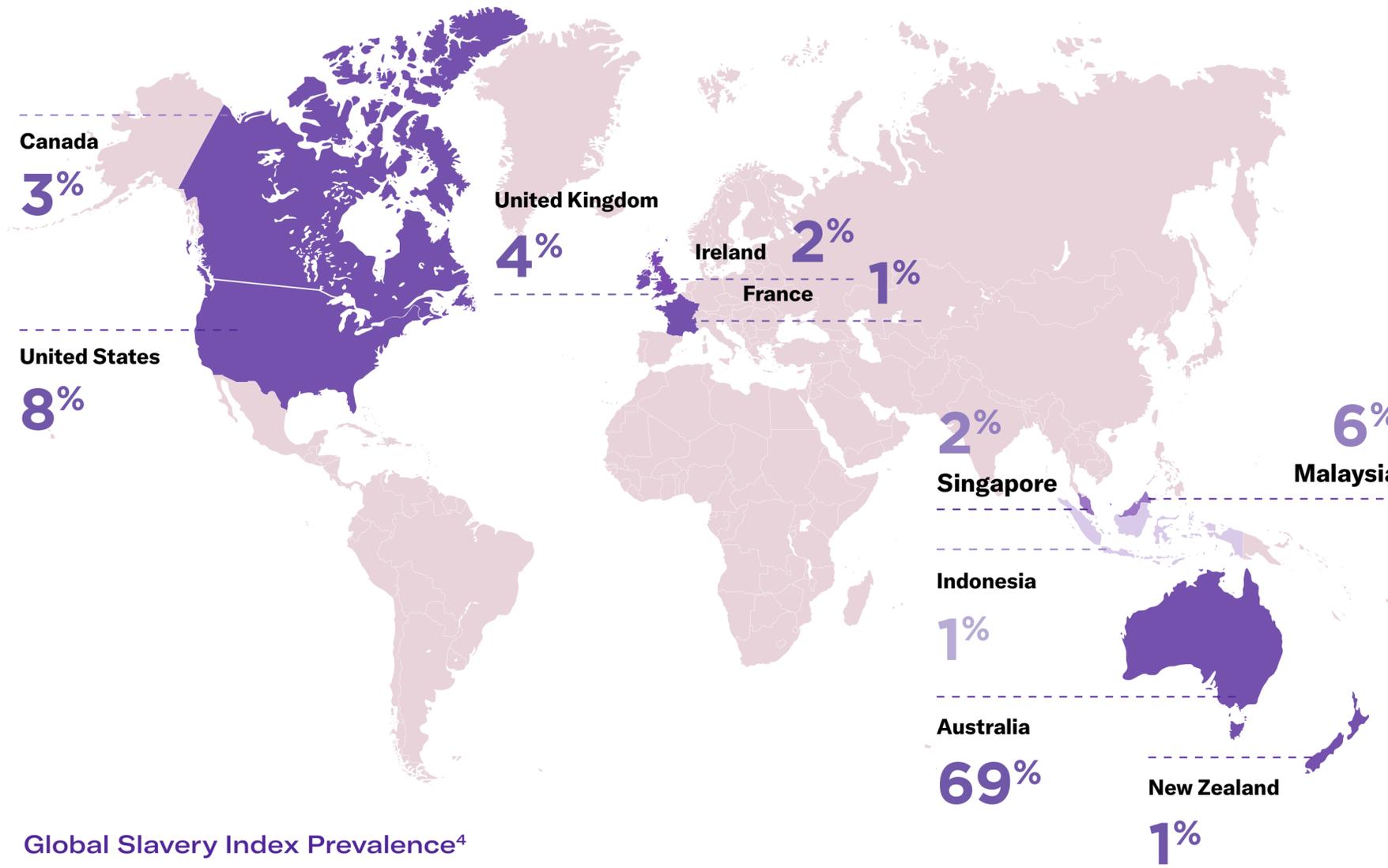
Virgin Australia procures a wide range of goods and services from third parties to support its end-to-end operations. This includes everything from aircraft and aircraft parts to onboard products, catering, and corporate and digital solutions.

We spent approximately AU \$4.1 billion during the reporting period with approximately 1,604 suppliers. Across these suppliers, 34% of spend is concentrated with our top five suppliers, with fuel comprising our largest procurement category in terms of spend.

Virgin Australia operates a centre-led procurement operating model, a hybrid structure that combines centralised strategic oversight with decentralised operational delivery (excluding Aircraft and Airports, which are managed by dedicated teams). This model spans across the sourcing and purchasing lifecycle and is supported by our procurement and purchasing frameworks. Contracts that are of a certain value and may present higher risk to Virgin Australia are supported by our Procurement team. Team members across different business units are empowered to self-manage lower risk and lower value engagements utilising a tiered level of support comprising various tools and resources. The Procurement team supports relevant business units to identify procurement requirements and lead commercial negotiations and works with the Virgin Australia Legal function to identify and manage contractual risk in our supplier agreements.

The map to the right provides an overview of spend based on the location of our tier 1 suppliers. We acknowledge that this may not necessarily reflect where the products are sourced, produced or manufactured and as such may not provide a complete overview of our geographical modern slavery risk profile. Suppliers located in one country may also have operations or sub-suppliers in other countries, which can affect our modern slavery risk profile. We recognise that throughout our supply chain, particularly in deeper tiers, there are likely to be sub-suppliers operating in or sourcing from jurisdictions reported to be more vulnerable to modern slavery risks.

## Top countries by spend<sup>3</sup>



## Global Slavery Index Prevalence<sup>4</sup>



## Top 5 procurement categories based on spend

**1. Fuel 26%**   
Aircraft fuel, and fuel for vehicles and equipment.

**2. Airport fees 19%**   
Fees related to airport operations, security and screening.

**3. Engineering 15%**   
Aircraft engineering materials, equipment and consumables and engineering services (including maintenance).

**4. Aircraft leasing 7%**   
Fees payable to aircraft lessors.

**5. Navigation 4%**   
Fees paid by aircraft operators for the use of air traffic control, and en-route and terminal navigation services.

<sup>3</sup> Percentage of our spend in each identified country.

<sup>4</sup> Estimated prevalence of modern slavery (per 1,000 population) according to [Walk Free, Global Slavery Index 2023](#).

# Understanding our modern slavery risks

## How we think about modern slavery risk

Our approach to thinking about modern slavery risks starts with a simple question: who could be harmed and how?

We seek to look beyond traditional business risk metrics to understand the human impact of our operations and purchasing decisions. This means examining not just what could go wrong for Virgin Australia, but more importantly, what workers, including those that are vulnerable, might experience in our extended network. By seeking to overlay people in our risk thinking, we endeavour to better target our efforts and resources.

Virgin Australia is committed to respecting all internationally recognised human rights, including the right to freedom from slavery, through our business activities and our business relationships across our value chain. We are also committed to doing business in line with the UNGPs.

The UNGPs are the global standard for addressing human rights impacts associated with business activities, such as modern slavery. They outline a continuum of involvement which helps businesses to understand their actual or potential human rights impacts and how to appropriately respond. The [Australian Government's guidance](#) also encourages reporting entities to draw on this continuum in identifying, addressing and reporting on modern slavery risks. Further details on the continuum of involvement, including hypothetical examples relevant to the aviation sector, are included in the box to the right.

We acknowledge our responsibility to avoid causing or contributing to modern slavery and other adverse human rights impacts and to address any potential risks and incidents as we identify them. We also seek to prevent and mitigate adverse human rights impacts, such as modern slavery, that we identify we may be directly linked to through our business relationships, including by seeking to build and use our leverage in line with the UNGPs.

Given our risk profile and the controls we have in place, we have assessed that we are more likely to be directly linked to modern slavery through our suppliers or other business relationships, rather than causing or contributing to it. We acknowledge that, should we fail to have appropriate controls in place, or fail to act on credible reports of modern slavery, we may then be at risk of contributing to modern slavery in these instances.

## Responding to an evolving modern slavery risk profile

As our industry continues to evolve, new risks may emerge. A supplier that presents low risk today might face new pressures tomorrow, whether from economic downturns, natural disasters or changing labour laws. The expansion of gig economy models in ground transport, the impact of automation on workforce dynamics, and climate-related disruptions to supply chains may create new challenges. We are also aware that cost-of-living pressures may increase workers' vulnerability to exploitation. We've learned that static, annual assessments may miss these shifts. We are therefore working on more responsive risk identification processes that draw on insights from our crew and ground teams, industry networks and supplier relationships. This enables us to detect emerging risks early and take action before they escalate.

We actively monitor emerging risks and regulatory developments. This includes tracking proposed reforms to the Act, guidance from the Australian Border Force's Modern Slavery Business Engagement Unit and international initiatives such as the UK Modern Slavery Registry and EU Corporate Sustainability Due Diligence Directive. We also draw on credible data from civil society and law enforcement to identify high-risk geographies, vulnerable worker groups, and sectors at higher risk of modern slavery.

### Modern slavery

is an umbrella term used to describe a range of exploitative practices which are all serious crimes under Australian law.

The Act defines modern slavery as including forced labour, debt bondage, deceptive recruiting for labour or services, trafficking in persons, slavery, the worst forms of child labour, servitude and forced marriage.

### Cause

A business could cause modern slavery where its actions or omissions directly result in the modern slavery harm occurring.

For example, an airline could cause modern slavery if it subjects its workers to exploitative conditions that meet the threshold for modern slavery, such as forced labour.

### Contribute

A business could contribute to modern slavery where its actions or omissions (such as engagement with suppliers) significantly incentivise, enable or facilitate the modern slavery harm occurring.

For example, an airline could contribute to modern slavery if it was aware of credible evidence that the cleaning company it engages to clean its planes was confiscating its migrant workers' travel documents so that they could not leave their employment or the country and the airline did not take any steps to address the situation.

### Directly linked

A business could be directly linked to modern slavery if its operations, products or services are connected to modern slavery through the actions of another entity such as a sub-supplier.

An airline could be directly linked to modern slavery if a textiles sub-supplier in its uniform supply chain was using child labour, and the airline had taken all reasonable steps to prevent and mitigate modern slavery risks in its uniform supply chain. An airline may also be directly linked to modern slavery if a person was trafficked into, within or out of Australia using its services, despite the airline taking all reasonable steps to prevent trafficking on its flights.

# Our potential modern slavery risks

Like all commercial airlines, Virgin Australia is exposed to modern slavery risks through the operation of air travel and freight services and the procurement of goods and services.

The global nature of the aviation industry means that our supply chain is widespread, complex and evolving. In line with the UNGPs, Virgin Australia takes a risk based approach focusing on the areas of greatest risk to people across our operations and supply chain.

Modern slavery risk is not uniform across our network. We consider a range of factors when assessing our modern slavery risks, including sector risks, geographical risks and risks related to worker vulnerability. Local labour markets, enforcement capabilities and

community support structures may also influence vulnerability. Where feasible, we are learning to calibrate our approach based on these local realities rather than applying blanket risk ratings. This means taking a risk-based approach and engaging with suppliers about their specific operating contexts and understanding how geographical risk indicators lead to increased vulnerabilities. See page 17-18 for more details on our risk assessment and management processes. The boxes below provide an overview of the potential modern slavery risk areas in our operations and supply chain.

While there have been no significant changes in our modern slavery risk profile during the reporting period, we recognise the aviation sector operates in a global and dynamic environment and as such our risk profile may evolve over time. Our risk profile may be influenced by internal and external factors, such as social, economic, geo-political

and environmental factors. We have a range of controls in place, as detailed in this Statement, to support us to monitor and manage those risks. See page 18 for details of how we do this.

As outlined above, we have assessed that our key modern slavery risks are most likely to arise through direct linkages in our supply chain. However, we acknowledge that there may be situations where we could potentially move from being directly linked to modern slavery to contributing to it (see page 14).

Even with robust policies and good intentions, modern slavery risks may materialise within our operations. The complexity of airport environments, the use of specialist contractors, and the 24/7 nature of our industry create particular pressure points.



## Supply chain risks



Aircraft components



Facility, maintenance and security services



Food and catering



Clothing and personal protective equipment



Fuel

## Operations risks



Indirect workforce - outsourcing to third-party providers



Human trafficking

## Operations risks

The following table provides an overview of where we've identified potential risk areas.

## Supply chain risks

The following table outlines areas within our supply chain that have been identified as potentially presenting a higher risk of modern slavery.

	 <b>Indirect workforce – outsourcing to third-party providers</b>	 <b>Human trafficking</b>	 <b>Aircraft components</b>	 <b>Fuel and fuel related products</b>	 <b>Facility services maintenance and security services</b>	 <b>Food and catering</b>	 <b>Clothing &amp; personal protective equipment (PPE)</b>
Risk description	<p>Over 82% of our direct and indirect workforce are based in Australia and New Zealand, resulting in a lowered risk of modern slavery occurring in our operations compared to workers in other jurisdictions that may be higher risk. However, we are aware that there is an increased risk of modern slavery for our indirect workers working in offshore locations.</p>	<p>Human trafficking is the physical movement of people across and within borders through deception, threats or coercion. Once trafficked, individuals may be subjected to ongoing exploitation when they reach their destination. As an operator of domestic and international airline services, Virgin Australia recognises the potential for airline services to be exploited by offenders for the purposes of facilitating human trafficking to, from and within Australia.</p>	<p>Refers to the supply of individual parts that are utilised by our Engineering team to service our aircraft.</p>	<p>Fuel is critical to the supply of our services. We also require fuel-related products, such as oil and lubricants and equipment to load fuel onto aircraft to provide our services.</p>	<p>Refers to the supply of cleaning, general maintenance (e.g., electrical, plumbing, grounds, waste removal, fire systems), security and other services.</p>	<p>Refers to food and catering services used across different parts of our business including on board our aircraft, in corporate offices and in our Lounges. Our suppliers source fresh produce on our behalf, prepare and serve food and beverages to customers, and provide cleaning services related to food and catering. This procurement category also captures complementary services to the provision of food and catering – for example, the supply of cutlery, napkins and condiments.</p>	<p>Refers to uniforms for frontline employees, branded merchandise for internal and external use, and personal protective equipment for all team members.</p>
Potential level of involvement in the risk area	<p>Virgin Australia could be directly linked to modern slavery in this risk area, for example if:</p> <ul style="list-style-type: none"> <li>Providers were to engage low-skilled labour to provide cleaning, security or other services for their sites and these workers were exploited.</li> <li>Providers used third-party recruiters which subjected workers to modern slavery practices such as debt bondage.</li> </ul>	<p>Virgin Australia could be directly linked to modern slavery in this risk area, including if our airline services are used without our knowledge to transport modern slavery victims domestically or internationally.</p>	<p>Virgin Australia could be directly linked to modern slavery in this risk area, for example if:</p> <ul style="list-style-type: none"> <li>Suppliers or sub-suppliers were to use raw materials produced using modern slavery in the manufacturing of aircraft components.</li> <li>Raw materials or finished components were transported or stored using logistics services provided by third parties with exploited labour.</li> </ul>	<p>Virgin Australia could be directly linked to modern slavery in this risk area, for example if:</p> <ul style="list-style-type: none"> <li>Suppliers and sub-suppliers of crude oil were to use exploited labour in sourcing raw materials.</li> <li>Suppliers and sub-suppliers were to use exploited workers in the transportation of jet fuel to on- and off-airport storage facilities.</li> </ul>	<p>Virgin Australia could be directly linked to modern slavery in this risk area, for example if:</p> <ul style="list-style-type: none"> <li>Primary contractors engaged by Virgin Australia or their sub-contractors were to use exploited labour to provide facilities management services.</li> <li>Goods and materials used by primary contractors engaged by Virgin Australia or their subcontractors were produced using modern slavery.</li> </ul>	<p>Virgin Australia could be directly linked to modern slavery in this risk area, for example if:</p> <ul style="list-style-type: none"> <li>Suppliers and sub-suppliers of fresh produce were to use exploited labour in the harvesting of fruit and vegetables.</li> <li>Suppliers and sub-suppliers were to use exploited contract workers in the processing and preparation of food products.</li> <li>Raw ingredients and processed foods were transported using logistics services provided by third parties who use exploited workers.</li> </ul>	<p>Virgin Australia could be directly linked to modern slavery in this risk area, for example if:</p> <ul style="list-style-type: none"> <li>Suppliers or sub-suppliers were to use raw materials produced using modern slavery in the manufacture and production of textiles and garments.</li> <li>Suppliers or sub-suppliers were to manufacture textiles and garments using exploited labour.</li> </ul>

# How we address our modern slavery risks

Modern slavery can occur in any industry or sector, which is why we remain committed to further improving our transparency, management and oversight of potential modern slavery risks in our operations and supply chain.

Modern slavery risks within our operations and supply chain are assessed and managed through our established Group-wide Risk Framework and Modern Slavery Framework. Built around five key pillars, our Modern Slavery Framework provides a structured approach to how we identify, assess and address our modern slavery risks. Each year, we develop a modern slavery action plan to support the implementation of our framework and guide Virgin Australia's focus areas for the year.

## Governance

Our modern slavery response is managed through a clear governance framework that allows for an integrated and Group-wide approach to identifying and addressing modern slavery risks. Each Virgin Australia Group Board has direct responsibility for the actions taken by Virgin Australia Group companies and our reporting obligations under the Act, including the approval of our annual modern slavery action plan through the Audit, Risk, Sustainability and Compliance Committee (ARSCC). The day-to-day management of our Modern Slavery Framework and annual action plan is undertaken by our Ethics and Compliance team. Initiatives under our action plans are assigned to accountable ELT members and supporting functions within their division, with ongoing oversight.



### Governance

Embedding modern slavery considerations across our leadership and governance processes.



### Management

Integrating modern slavery risk management controls across our operations and supply chain.



### Communication

Promoting an understanding and awareness of modern slavery across our people and third parties.



### Engagement

Undertaking meaningful engagement with stakeholders to inform our modern slavery response.



### Grievance mechanisms, and remediation

Operating trusted grievance channels for stakeholders to report modern slavery related concerns and responding appropriately.

## Our modern slavery governance framework

Virgin Australia Boards	Responsible for overseeing and monitoring the effectiveness of the Group's Modern Slavery Framework and broader human rights work, and of the Group's systems and processes for legal and regulatory compliance, including with the Act.
Board Safety and Operational Risk Review Committee (BSRRC)	Assists the Board in fulfilling oversight of operational safety, health and security risks. Monitors compliance with statutory and regulatory obligations including workplace safety standards that can identify exploitation indicators including related to human trafficking.
Remuneration, Nomination, People and Culture Committee	Assists in oversight of remuneration, nomination policies, and people strategies, ensuring ethical employment practices.
Audit, Risk, Sustainability and Compliance Committee (ARSCC)	Assists the Board in corporate governance oversight including risk management, compliance and sustainability initiatives. Responsible for overseeing Virgin Australia's Ethics and Compliance and Risk Management Frameworks and internal risk control.
CEO and Executive Leadership Team (ELT)	Accountable for the implementation of our Ethics and Compliance program and managing modern slavery risks across the Group. Modern slavery program status is reported quarterly to ARSCC.
Sustainability Steering Committee	Responsible for overseeing Virgin Australia's efforts with respect to sustainability related activities in the areas of environment, climate, community, waste and human rights including modern slavery. The Sustainability Steering Committee meets at least quarterly. It is comprised of executive team representatives and delegates from across the business and is chaired by the Chief Corporate Affairs and Sustainability Officer. A modern slavery program update is provided at each Sustainability Steering Committee meeting.
Ethics and Compliance Team	Responsible for setting the strategy and leading the Group's modern slavery program on a day-to-day basis and providing subject matter expert advice on human rights issues, including modern slavery risk management.
Supporting functions	Accountable for the delivery of initiatives under our Modern Slavery Framework and annual action plan and implementing actions to address modern slavery and other human rights risks. Functions are also responsible for identifying, reporting and monitoring potential modern slavery risks relevant to their functional area, with support from the Ethics and Compliance team.

# Policies

Virgin Australia has the following policies in place which support our modern slavery approach, setting clear expectations for our team, suppliers and other business relationships. These policies are endorsed or approved by the ELT and, where appropriate, approved by the Boards.

Policy	Relevance to modern slavery	How we implement this policy
 <b>Human Rights Policy</b>	<p>Our Human Rights Policy communicates Virgin Australia’s commitment to respecting human rights and the expectations we set internally and for third parties who work with us, including our suppliers and other business partners. The Policy includes modern slavery as a specific area of focus.</p>	<ul style="list-style-type: none"> <li>• Our Human Rights Policy is publicly available on our website and on our internal communication platforms. The policy encourages the reporting of any conduct which breaches or is suspected to breach the policy or concerns relating to human rights.</li> </ul>
 <b>Code of Conduct</b>	<p>Our Code of Conduct (<b>Code</b>) sets out how we do business and outlines the standard of behaviour expected from our team members and leaders. The Code emphasises our commitment to operating ethically and with integrity and includes a section on modern slavery. The Code outlines our commitment to respecting human rights and to business practices that are fair and considerate of workers, particularly in relation to the elimination of child labour. The Code also sets out our expectation that team members report any instances of human rights violations, which could include modern slavery.</p>	<ul style="list-style-type: none"> <li>• Our Code is made available on our website and on our internal communications platforms.</li> <li>• We provide training to all team members, including indirect workers, and leaders on the Code as part of our onboarding process and on an annual basis via our online education platform. The Code training module includes a modern slavery-specific component to encourage team members to consider how they can combat modern slavery risks in their roles.</li> <li>• Any breach or suspected breach of the Code can be reported internally via our standard reporting channels (including our Ethics Hotline) or through our whistleblower program.</li> </ul>
 <b>Risk Appetite Statement</b>	<p>Our Risk Appetite Statement provides a framework where risk appetite can be defined, documented, implemented and operationalised into quantifiable risk tolerances and limits. For modern slavery, which falls within the Legal and Regulatory risk dimension, there is no risk appetite, reinforcing that we are fully committed to playing our part towards the elimination of modern slavery and human trafficking in our supply chain and operations.</p>	<ul style="list-style-type: none"> <li>• The Risk Appetite Statement was last updated in 2024 and is made available on our internal communications platform. It is next scheduled for review in 2026.</li> <li>• The Board expects the relevant risk appetite to be considered in matters presented to it and will continue to review the Risk Appetite Statement to respond to changes in the group’s top strategic risks and the Board’s appetite for risk.</li> </ul>
 <b>Procurement and Purchasing Policy</b>	<p>Our Procurement and Purchasing Policy outlines the expected standards of conduct for Virgin Australia’s procurement activities, including requirements for ethical and socially responsible sourcing and managing modern slavery risks.</p>	<ul style="list-style-type: none"> <li>• Our Procurement and Purchasing Policy is made available on our internal communications platforms.</li> <li>• The Procurement team delivers targeted training to team members within the Virgin Australia Group responsible for sourcing goods and services that support our operations.</li> </ul>
 <b>Supplier Code of Conduct and Supplier Commitments</b>	<p>Our Supplier Code of Conduct and Supplier Commitments articulate Virgin Australia’s expectations of, and impose obligations on, suppliers in relation to modern slavery, labour rights, and broader human rights. They inform suppliers that they must comply with all applicable modern slavery laws and have in place policies and procedures to prevent modern slavery in their operations and supply chain.</p>	<ul style="list-style-type: none"> <li>• Our Supplier Code of Conduct and Supplier Commitments are publicly available on our website and on our internal communications platforms.</li> <li>• Virgin Australia’s standard supplier contract terms include a requirement for suppliers to commit to complying with the Supplier Code of Conduct and Supplier Commitments.</li> <li>• Targeted training on contract drafting and negotiation, including with respect to the Supplier Code of Conduct and Supplier Commitments is delivered to team members in the business who are responsible for negotiating supplier contracts.</li> <li>• The Supplier Code of Conduct and Supplier Commitments were reviewed and updated during the reporting period and will be made publicly available in FY26.</li> </ul>
 <b>Modern Slavery Incident Response and Remediation Policy</b>	<p>Our Modern Slavery Incident Response and Remediation Policy provides team members with high-level guidance on the appropriate actions to take if they become aware of a credible allegation of modern slavery connected to Virgin Australia’s business activities or business relationships, including within our supply chain.</p>	<ul style="list-style-type: none"> <li>• Our Modern Slavery Response and Remediation Policy is made available on our internal communications platforms.</li> <li>• Targeted modern slavery awareness training is provided to team members who are most likely to be exposed to incidents of modern slavery, including our frontline team members (Flight, Cabin and Ground Crew).</li> <li>• We reviewed and updated our Modern Slavery Incident Response and Remediation Policy during the reporting period (see page 23). The updated policy will be rolled out across the business over the coming year.</li> </ul>
 <b>Whistleblower Policy and supporting Speak Up mechanisms</b>	<p>Our Whistleblower Policy outlines the processes in place to receive and manage reports, regarding potential misconduct, including suspected or actual unethical, illegal, corrupt, fraudulent or undesirable conduct, as well as concerns that represent a potential breach of the Code. This can include complaints relating to modern slavery.</p> <p>Speak Up mechanisms: We encourage people to report modern slavery and broader human rights concerns through any of the available channels including our Ethics Hotline, a 24/7 confidential reporting hotline that is serviced by an independent provider, or via other options including our line leaders.</p>	<ul style="list-style-type: none"> <li>• Our Whistleblower Policy is publicly available on our customer facing website and on our internal communications platforms.</li> <li>• Speak Up mechanisms are promoted across our internal communications channels and are referenced in Virgin Australia conduct policies, including the Whistleblower Policy and our Code.</li> <li>• We provide regular reports to our ARSCC on material business conduct concerns and material breaches of our Code, including data on Ethics Hotline reports.</li> </ul>

# Operations risk management

We consider the modern slavery risks associated with our direct workforce to be low given the nature of our workforce and the controls we have in place.

Our direct workforce is covered by individual employment contracts, modern awards and enterprise agreements, which confer at least minimum pay and entitlements and provide for consultation regarding significant operational changes where appropriate. We recognise team members' rights to negotiate collectively, with or without the involvement of third parties such as unions. Our employment contracts reflect the employment standards relevant to workers (including minimum pay and other entitlements to leave and maximum weekly hours) and include a clause which reflects Virgin Australia's commitment to respecting our workforce's human rights.

Compared to our direct workforce, we are aware our indirect workforce may be at comparatively higher risk of modern slavery in some circumstances. For example, the use of third-party providers can involve a range of modern slavery risks, including where providers may engage low-skilled labour to provide cleaning, security or other services for our sites. These services may also be provided in locations where there is a higher reported prevalence of modern slavery and in contexts where third-party recruiters may charge recruitment fees which could result in workers being subjected to modern slavery practices such as debt bondage. As such, during the reporting period we took steps to strengthen our due diligence approach to offshore contractors.

We also take steps to mitigate the risk of human trafficking on our flights, acknowledging the distinct risks within the aviation industry and the important role airlines play in its identification and prevention. We engage with the AFP, Australian Border Force and other relevant government agencies to help minimise the risk of human trafficking and ensure appropriate response processes and mechanisms are in place should any concerns be identified. Our targeted training and awareness program is designed to equip frontline team members with the knowledge and tools to recognise indicators of modern slavery, including human trafficking (see page 25 for further details). Recognising the importance of collective action, we also collaborate with industry peers through the MSAF to share insights and strengthen sector-wide efforts (see page 25).



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## Case study Strengthening our due diligence on offshore contractors

At Virgin Australia, we engage over 2,000 offshore contractor workers to support our work in a range of areas, including contact centres, ground crew, customer experience, member services and technology platforms. These contractors come from a range of countries, including the Philippines, India, Fiji, Indonesia and New Zealand.

During the reporting period, we developed a Modern Slavery Risk Management Framework for Offshore Contractors (**Offshore Contractor Framework**) to uplift our modern slavery due diligence approach. The Offshore Contractor Framework sets out key steps to guide our risk assessment and management process with respect to offshore contractors. Key steps focus on contractor screening, onboarding, ongoing monitoring and engagement. It also maps responsible business units within Virgin Australia and leverages our key existing modern slavery due diligence processes, including KO3P screening and ongoing contract management processes.

Following this work and outside of the reporting period, we have commenced testing some elements of the Offshore Contractor Framework. For example, as part of our monitoring of offshore contractors, we have developed an Observational Indicators Checklist to assist our people conducting site visits to identify potential modern slavery and broader labour rights red flags. These indicators prompt those conducting the site visit to consider factors such as whether the facilities appear clean and well-maintained, and whether there are any observable signs of labour exploitation, such as potential indications of excessive working hours or workers having their movement restricted.

To test this, two different teams preparing for offshore contractor site visits with call centre providers in the Philippines were provided information on the indicators. Following each visit, a debrief call was held which confirmed that no modern slavery indicators had been observed. These calls also served as an opportunity to gather feedback on the indicators, which will be used to refine and improve them over time.

## Reflections

The Offshore Contractor Framework provides a clear structure for aligning responsibilities in managing modern slavery risks. Initial pilots of the Observational Indicators Checklist have identified opportunities for further capacity-building initiatives to ensure our team members are equipped with the knowledge needed to effectively identify modern slavery red flags and navigate the complexities of modern slavery, recognising that exploitation occurs along a continuum.

## Looking forward

Over the coming year, we will continue to test and refine the Offshore Contractor Framework, including through engagement with relevant business units. Our focus will then shift to building understanding and awareness of the Framework across relevant teams and modern slavery more generally. We will also look to consider further opportunities across the business during planned site visit activities to further pilot our program and consider where we can automate workflow processes, such as through online forms.

# Supply chain risk management

We continually enhance the way that we identify, evaluate, mitigate and monitor our modern slavery risks within our supply chain through our third-party due diligence and risk assessment processes.

During this reporting period we uplifted and launched our 'KO3P 2.0' program which provides us with a deeper understanding and visibility of Virgin Australia's modern slavery risks across the supply chain. The KO3P 2.0 program enhanced our supplier screening, deepened due diligence for high-risk assessments, and introduced automated reporting. In addition, our External Questionnaires (EQs) are now deployed to third parties which include detailed questions on worker demographics, wage policies, recruitment practices, grievance mechanisms, and visibility over sub-tier suppliers. Responses are reviewed by the Ethics and Compliance team, and used to inform approval decisions and potential remediation and/or engagement strategies. The updated system also allows for continuous monitoring with real-time alerts and automated re-evaluations, which are aligned to the supplier's risk rating.

Our approach to supplier due diligence for contracts that are administered through the Group's contract approval and execution system follows a four-step process. A high-level overview is outlined in the following diagram with additional information included.

Our due diligence process continues to follow the same high-level workflow.

## Identify

- Screening suppliers for modern slavery risks with a new third-party technology tool.
- Supplier Drill Downs Framework for high-risk suppliers.

## Assess

- KO3P 2.0 assessment provides risk rating.
- Supplier self-assessment questionnaires (SAQ).
- Supplier risk segmentation and prioritisation.

## Mitigate

- Modern slavery contract clauses and contract management.
- Business unit training, awareness raising and capacity building.
- Supplier Deep Dives, engagement and education.
- Corrective action plans.

## Monitor

- Supplier monitoring and review through KO3P 2.0.

KO3P 2.0 uses trigger-based logic to escalate risk assessments. For example, if a supplier operates in a high-risk jurisdiction or provides services in flagged categories (e.g., indirect labour, PPE, cleaning), the system automatically initiates a modern slavery EQ and flags the case for Ethics and Compliance review.

5. The number of suppliers identified as 'high risk' may differ depending on the risk assessment tool used. KO3P ratings reflect overall supplier risk, while the Drill Downs Framework focuses specifically on modern slavery risk factors.

# Drill Downs Framework

The Drill Downs Framework is an enhanced due diligence process designed to improve Virgin Australia's understanding of our suppliers by diving deeper into their corporate structures and their sub-tier suppliers.

As part of our targeted risk-based approach, we enrich our analysis with consideration of a range of risk factors, including sanctions, export controls, political exposure and risks of forced labour. We use a third-party technology tool to support our analysis within this framework.

In FY24, we piloted the framework to build our understanding of risks associated with our high-risk suppliers by commencing a review on their sub-tier supplier networks through our technology tools. In FY25, the Drill Downs Framework extended our due diligence beyond just tier one suppliers, but also to include manufacturers and subcontractors. The framework was embedded into Virgin Australia's due diligence system through the following key activities:

1. Additional screening process for suppliers that have been assessed as high-risk (including as part of the Deep Dive Program); and
2. Checks as requested by the business prior to entering a relationship with a supplier that has been identified as generally high-risk (i.e. not specific to modern slavery).

With support of various technology platforms on third-party risk intelligence, real-time data feeds and risk alerts, the Drill Downs Framework:

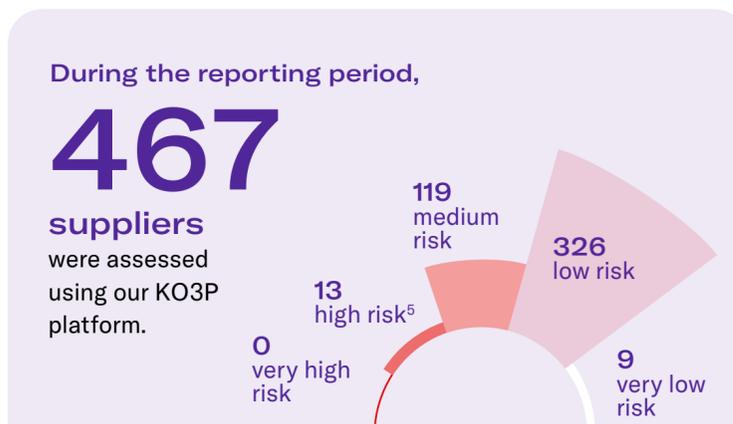
- Identified 16 high risk suppliers, with almost all requiring enhanced mitigation measures; and
- Mapped the supply chain of their tier 2 and tier 3 suppliers.

In FY26, Virgin Australia intends to continue integrating the Drill Downs Framework as part of our commitment to continuous improvement by:

- Conducting a review of existing and new high-risk suppliers for the purpose of identifying any new risk factors beyond tier 1; and
- Tracking the effectiveness of mitigation actions against high-risk suppliers in KO3P by conducting a re-vetting process. This involves assessing whether any new risk factors have emerged based on the existing nature of the arrangement that require updated mitigation measures, or confirming that existing actions remain appropriate and effective.

These actions seek to help Virgin Australia to consider the effectiveness of mitigation actions, whether any further appropriate steps are required, and ensure that all high-risk factors are visible beyond our tier 1 suppliers.

- As part of our risk-based due diligence approach, we are enhancing our internal processes to better review and respond to supplier audit findings. This includes embedding targeted questions into our KO3P 2.0 EQ to assess whether high-risk suppliers have conducted independent social audits or investigations into working conditions. Where audit findings are disclosed, they are reviewed by Ethics and Compliance and may trigger further due diligence, onboarding conditions or contractual obligations. We are expanding the scope of our expectations for high-risk suppliers to provide audit findings and engage with us on any adverse findings or opportunities for improvement.





## Case study Strengthening our supplier policies and support

Throughout the reporting period, we implemented several initiatives to enhance our approach to supplier risk management. These included revisions to our Supplier Code of Conduct and Supplier Commitments, along with the development of supporting materials to help ensure suppliers clearly understand the standards expected of them.

As part of our regular policy review cycle and broader policy uplift, we updated both our Supplier Code of Conduct and Supplier Commitments. A key change to the Supplier Code of Conduct is the requirement for suppliers to have policies and procedures in place to proactively prevent modern slavery within their operations and supply chains. In line with our commitment to continuous improvement, it also outlines that Virgin Australia will seek to support suppliers in actively strengthening their practices to support alignment with the Supplier Code of Conduct. Updates to the Supplier Commitments include clearer guidance for suppliers on how to raise concerns about actual or suspected breaches of the Supplier Commitments, including those related to modern slavery.

We also developed a Supplier Toolkit which is made available on our website: [Work with us](#), to provide our suppliers with information about our modern slavery risk management approach. The Toolkit is designed to help suppliers understand our expectations, identify potential modern slavery risks and red flags, and access clear guidance on how to report actual or suspected instances of modern slavery.

## Looking forward

In FY26, we plan to actively promote the Supplier Toolkit and updated Supplier Code of Conduct and Supplier Commitments across our supplier network to strengthen awareness and understanding of modern slavery risks. We will also look to explore opportunities for targeted training or awareness raising activities amongst different supplier groups.



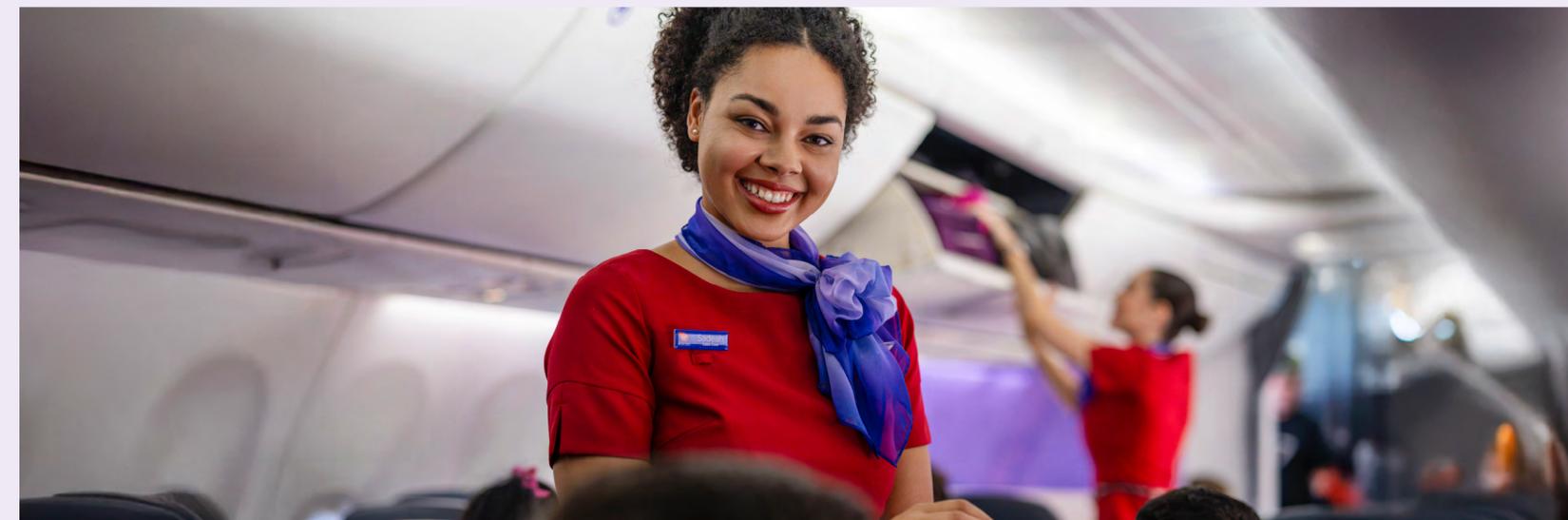
## Case study Supplier assessment matrix

During this reporting period, we developed a supplier assessment matrix, in which we looked at various ways to enhance existing internal supplier processes.

As part of this work, we completed a sample review of 13 suppliers that do not typically meet our standard threshold for due diligence within the KO3P system. As part of this review, each of the suppliers underwent an initial screening using our enhanced Drill Downs Framework. This allowed us to have a deeper understanding of the potential risks associated with the supplier and understand where there may be potential gaps with our current processes.

## Next steps

The sample review considered risks associated with each of the supplier's geographic locations, services, any adverse media reports and whether changes to our existing processes are required. The review identified several suppliers requiring further assessment based on their risk profile, highlighting some of the limitations of using spend as a threshold criterion. Additional screening was conducted on the suppliers, and we will continue to review and refine our due diligence approach over the coming year.



# Supplier Deep Dive Program

In FY25 we continued to implement our Supplier Deep Dive Program. In previous years, this Program has focused on the apparel and transportation repair and maintenance suppliers. In FY25, we focused our attention on cleaning services, a procurement category we have identified as potentially higher risk for modern slavery.

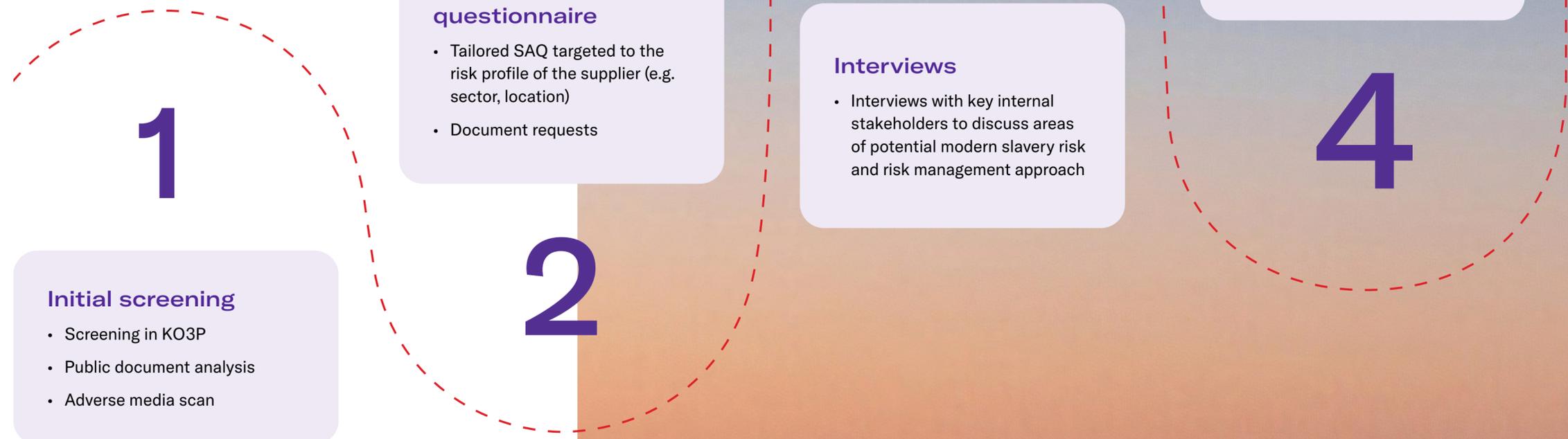
We acknowledge that cleaning services in Australia may involve potential modern slavery risks due to factors such as the use of low-skilled, temporary and migrant labour (who may not understand their workplace rights and entitlements); reliance on temporary contract workers; strong pricing competition; risks of unlawful deductions; high levels of subcontracting; and use of third-party labour hire arrangements.

Our existing Deep Dive methodology was reviewed and refreshed for this period to ensure that we are continuing to understand our suppliers' modern slavery risks and controls and to ensure we identify more opportunities for further collaboration. Our Deep Dive Program is supported by our KO3P 2.0 platform and the Drill Downs Framework, which provide richer insights and enable tailored approaches to supplier assessment. For example, KO3P 2.0 now includes review of social audit findings from high-risk suppliers, helping us target our Deep Dives where they can have the greatest impact. As part of this refresh, updates were made to our self-assessment questionnaire (SAQ) which can be tailored for any future shortlisted suppliers to complete. We also reviewed relevant publicly available information such as the supplier's Modern Slavery Statement and relevant policies. Having a more detailed SAQ and conducting a review of the supplier's key documentation meant that the conversations with the supplier were targeted in nature and more time effective. We applied our refreshed deep dive methodology with a cleaning supplier during the reporting period. A case study outlining the process and next steps is provided on the following page.

## Overview of Deep Dive methodology

Our approach to each Deep Dive varies depending on the supplier and its risk profile. The following diagram provides an overview of each phase of the supplier Deep Dive and some of the strategies that may be utilised.

### The process of our methodology



## Case study

### Managing modern slavery risks associated with cleaning

During the reporting period, we undertook a number of steps to strengthen our management of modern slavery risks within our cleaning services supply chain. These efforts focused on providing guidance materials to cleaning workers (see case study to the right), reinforcing our expectations around modern slavery risk management, increasing our oversight of supplier practices and also strengthening our relationship with a key supplier.

#### Cleaning supplier Deep Dive

We included modern slavery considerations within a competitive tender process to appoint a new cleaning provider for Virgin Australia's operational sites which includes offices and also airport facilities (excluding aircraft). As part of the tender process, we asked the suppliers to complete a tailored SAQ which asked a range of questions related to the supplier's modern slavery risk assessment, management and grievance processes. Once the preferred supplier was identified, the contract was awarded which included Virgin Australia's modern slavery standard clause.

In line with our refreshed Deep Dive methodology, we worked with our external business and human rights expert to conduct a Deep Dive with the supplier that was awarded the contract from the tender process.

The purpose of the Deep Dive was to strengthen engagement with our facilities management provider, gain a deeper understanding of the steps it is taking to assess and address modern slavery risks and opportunities for further action, including in collaboration with Virgin Australia. Building on the responses submitted through the targeted SAQ as part of the tender process, the Deep Dive included a high-level review of the facilities management provider's publicly available documents including its Modern Slavery Statement. We also conducted two interviews with the provider to understand in further detail the controls they have in place and discuss opportunities for potential further engagement (noting the second call occurred outside of the reporting period). It was acknowledged that an area of potential risk was in relation to the use of sub-contractors, however, the supplier outlined the steps they are taking to mitigate this risk including the use of contract clauses that require formal approval of any sub-contracting.

The Deep Dive identified additional positive actions being taken by the supplier including: providing information to employees regarding their wage rates and hours as part of the onboarding process; screening of suppliers through a modern slavery SAQ; conducting internal audits of those suppliers that have been identified as high-risk; and the provision of modern slavery training for those engaged in purchasing. One area identified for improvement was enhancing modern slavery awareness among cleaning workers.

#### Reflections

The supplier responded positively to the process, demonstrating a constructive and open approach. They expressed a willingness to continue engagement and explore opportunities for collaboration, including potential joint initiatives to strengthen modern slavery risk management.

#### Looking forward

We will continue working with the supplier to identify opportunities for collaboration, with a particular focus on building worker capacity and raising awareness of modern slavery. We also plan to apply the Deep Dive methodology with another supplier operating in a different area of identified risk.

## Case study

### Updating Virgin Australia's cleaning handbook

We updated Virgin Australia's Aircraft Interior Cleaning Handbook which provides guidance to cleaners on a range of issues including cleaning products to use, operating procedures for different aircraft, communication between contractors and Virgin Australia, performance management and security, and health and safety risk management. The Aircraft Interior Handbook was updated to also include our expectations of cleaning contractors with respect to modern slavery risk management and reporting concerns, including details of reporting channels.



## Case study

# Ongoing risk management in our extended clothing supply chain

In our FY24 Statement, we reported that a tier 1 clothing supplier identified several labour rights issues within two of its tier 1 suppliers (Virgin Australia's tier 2 suppliers) through routine social audits (see page 20 of our FY24 Modern Slavery Statement). In both instances, further investigation did not identify any evidence that these issues were associated with modern slavery practices.

During the reporting period, we have engaged in ongoing dialogue with our tier 1 supplier to discuss any issues that arise as part of their ongoing due diligence activities related to the two sub-suppliers, including the implementation of corrective action plans and any additional audits and the due diligence conducted on them, as well as our supplier's broader engagement with all its factories on labour-related matters.

A follow up audit was also conducted by our tier 1 supplier of both tier two suppliers during the reporting period. One supplier increased its overall performance in the audit and the audit findings indicated that it had addressed the previously identified issues related to working hours. The audit of the other supplier suggested it had not made the same level of progress, and challenges remain in relation to working hours. We are continuing to work with our tier one supplier to engage with the tier two supplier to strengthen its corrective action approach.

During the reporting period, a routine audit of a third supplier also identified issues related to working hours. This supplier has since developed a corrective action plan which includes:

- Educating workers on their rights regarding working hours and reporting mechanisms.
- Conducting monthly internal audits to track overtime compliance.
- Strengthening overtime policies and management.
- Improving workforce planning and shift adjustments.
- Monitoring in real-time to track when overtime of workers approaches legal limits.

## Reflections

We have continued to strengthen our engagement with our tier 1 supplier by maintaining open and constructive dialogue throughout the reporting period. This ongoing collaboration has helped reinforce our relationship and build trust and is key to enabling engagement with the tier two suppliers, with whom we do not have a direct contractual relationship. Our continued work within the clothing supply chain highlights the critical importance of regular monitoring and demonstrates that implementing effective controls and corrective actions is a process that requires time, commitment and sustained effort.

## Next steps

We will continue to monitor the implementation of the corrective actions through our tier 1 supplier and provide support as needed, including capacity building and advisory guidance. We acknowledge that despite our efforts, challenges remain — particularly in areas where we lack direct contractual relationships or visibility into sub-tier suppliers. These limitations reinforce the importance of building leverage through long-term partnerships and sector-wide collaboration.

## Case study

# Engaging with our code-share partners on modern slavery risk management

At Virgin Australia, we engage with airline partners through code share arrangements to provide our customers a broad range of choice for global destinations.

During the reporting period, we engaged with two of our major international airline partners to share knowledge about our respective modern slavery risk management approaches and explore opportunities for ongoing engagement. We took a collaborative approach to this engagement, recognising that aviation-related modern slavery risks often occur at shared touchpoints where multiple airlines' operations intersect.

The engagement focused on a number of areas including:

- Operations and supply chain footprint.
- Modern slavery due diligence methodologies.
- Potential areas of modern slavery risk across operations and supply chain.
- Modern slavery training and awareness programs.
- Grievance mechanism accessibility.

## Reflections

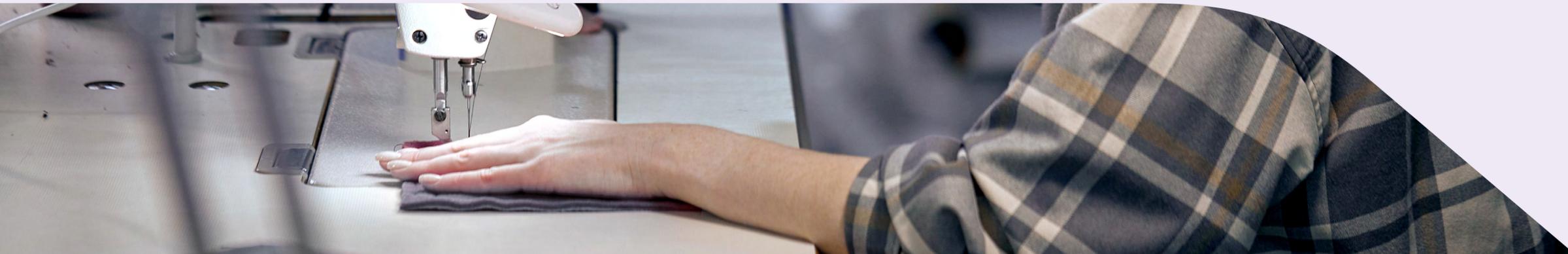
This process provided us the opportunity to better understand our airline partners' modern slavery risk management approaches and to identify key areas for uplift in our own approach. Following this engagement, we:

- Enhanced our EQ screening questions on recruitment fees and document retention for specific supplier types.
- Further refined our risk-based approach to the level of due diligence required from our airline partnerships.
- Reviewed our current modern slavery-related contract clauses. Whilst we adopt a graduated approach to modern slavery clauses, requiring stronger commitments for higher risk business partners, we identified an opportunity to further refine our approach through developing a shared responsibility model approach to expectations.

## Looking forward

In FY26, we plan to explore our approach to contractual expectations related to modern slavery. Aligned with the NSW Anti-Slavery Commissioner's [Guidance on Reasonable Steps](#), under this model, contracts move away from relying on representations and warranties, to a "performance-based contracting approach that recognises the buyer and supplier's shared responsibility for managing modern slavery risks, through ongoing due diligence and remediation." This type of approach acknowledges that systemic change requires cooperation and ongoing engagement, not just compliance.

We also recognise that uniform supply chains present shared challenges across industries. As part of our continuous improvement approach, we are exploring how other sectors manage modern slavery risks in their uniform procurement processes, including approaches to supplier engagement, subcontractor oversight and grievance mechanisms. These insights will help inform our future strategy and strengthen our ability to manage risks in this area, by aligning with our broader efforts to strengthen supplier oversight, including expanding our expectations for high-risk suppliers to provide independent audit findings and engage with us on any identified risks or improvement opportunities.



# Grievance mechanisms

During the reporting period, we continued to strengthen our systems and processes to respond to reports of actual or suspected instances of modern slavery in a safe, sensitive and appropriate manner that is aligned with international expectations, including the UNGPs.

## Our approach to modern slavery incident management and remediation

As part of our ongoing efforts to strengthen our incident response approach, we made several updates to our Modern Slavery Incident Response Policy during the reporting period. These included providing additional guidance on the incident assessment process, outlining key considerations such as the location of the alleged incident (e.g., within Australia, overseas, on an aircraft, a tier 1 supplier or deeper in the supply chain), the relevant authorities that may need to be notified, the potential involvement of external stakeholders and consideration of Virgin Australia's level of involvement in the alleged incident in line with the UNGPs. In recognition of the importance of ensuring victims of modern slavery have access to appropriate remedy, we also renamed the policy to the Modern Slavery Incident Response and Remediation Policy to better reflect its purpose and scope.

To support the implementation of the policy, we developed a guidance document that includes a checklist and decision tree to assist team members in responding to and remediating (where necessary) actual or suspected instances of modern slavery. These tools are designed to clarify the steps team members are expected to take and support a consistent, standardised approach across the business. Additionally, we created

hypothetical scenarios to illustrate how modern slavery risks might arise within our operations and supply chain, offering practical guidance on how to respond in alignment with the Modern Slavery Incident Response and Remediation Policy. We anticipate finalising and rolling out these supplementary materials across the organisation in the next reporting period.

In addition, Virgin Australia's updated EQ assesses whether suppliers provide anonymous grievance channels and access to remedy for workers. Where gaps are identified, Virgin Australia may engage with suppliers to strengthen these mechanisms or provide guidance on best practice.

In FY25, 22% of all concerns were raised by our contractors and third-party suppliers (none of which related to modern slavery). This demonstrates that our reporting channels are accessible beyond Virgin Australia's direct workforce and provide valuable visibility into third-party contractor behaviours that may impact our operations, safety, and culture.

### Most popular channel to raise concerns:



## Encouraging a Speak Up culture

In FY25, we launched our updated Speak Up communications campaign across various internal channels, through all desktop wallpapers, Microsoft Teams backgrounds, email signatures banners and our internal intranet page. The purpose of this campaign was to empower team members to voice their concerns and increase awareness of the available reporting channels, such as the Ethics Hotline. The campaign highlighted the range of issues that could be raised via the Ethics Hotline, such as modern slavery and broader human rights concerns. It also reinforced the messaging that retaliation against team members who raise concerns will not be tolerated. Shortly after launching the campaign, Speak Up reports more than doubled in that quarter compared to the same quarter in FY24 (although none of these were related to modern slavery). This upward trend also captures conduct beyond Virgin Australia's direct workforce, offering insight into third-party contractor behaviours and providing promising signs of increased trust and awareness of the Speak Up mechanism with our team members and external stakeholders.

### Year on year comparison

**Trends** 106% increase overall, or 2 times greater overall

### What the numbers tell us

An increase in reports may reflect greater awareness and trust in our reporting systems, rather than a rise in misconduct. We view increasing reports from contractor and supplier workers as a positive indicator that our outreach is working, but we recognise that there is more work to be done in this space.

## Speak Up reporting during FY25

All available data on Speak Up matters are provided to the ARSCC on a quarterly basis. To ensure consistent reporting and accuracy of the data, quarterly tests are completed as part of a health check on the Ethics Hotline functionality and effectiveness. These reports identify the key trends and issues across divisions by analysing the types of complaints, rate of anonymity reporting, and the reports status as substantiated, unsubstantiated or under investigation. This is crucial in understanding the broader culture of compliance within Virgin Australia as, for example, a higher identified reporter rate may demonstrate trust in the Speak Up program and provide an indicator of a healthier corporate culture.

No modern slavery-related complaints were reported during FY25. However, we acknowledge the absence of complaints does not necessarily indicate the absence of occurrences or risks. We will continue to monitor reports for precursors to human rights-related matters, including modern slavery. We understand that there may be a range of barriers that prevent people from raising modern slavery-related concerns through our Speak Up channels, and these could relate to language limitations, fear of job loss or visa implications, lack of awareness of the mechanism, lack of access to technology (such as a phone or the internet), cultural factors affecting willingness to report, or a distrust of corporate reporting systems.

In FY26, we plan to enhance our Speak Up program by improving our reporting, case management and investigation capabilities. As part of this effort, we will address language-related accessibility barriers with updates to the Speak Up channels to support multiple language interfaces. We will also explore opportunities to raise further awareness of the mechanism across our workforce and supply chain.

## Law enforcement referrals and engagement

Our cabin and ground crew may identify indicators of modern slavery during their work. During the reporting period, our team made several referrals to the AFP following the identification of potential indicators. Where appropriate, we engaged with the AFP and other relevant law enforcement agencies to support investigations into human trafficking.

# Training, awareness and capacity building

Empowering our people to recognise and respond to modern slavery risks is a key element of our modern slavery risk management approach.

Our training modules are designed to build awareness of Virgin Australia's commitments and clarify how these principles apply to individual roles and responsibilities. By fostering this understanding across our workforce, we aim to embed a proactive and informed approach to modern slavery risk management throughout the business.

In FY25, we completed our Mandatory vLearn Governance Uplift Project, which relates to the Code of Conduct module. We conducted a comprehensive review to ensure that training is appropriately aligned with user roles by identifying the correct user groups required to complete the training. Additionally, the Mandatory Training Compliance Committee defined 'completion' to ensure consistency and efficiency in compliance tracking across Virgin Australia.

## Virtual Learning Modules

### Code of Conduct

These modules cover key elements including how to manage third-party relationships, Virgin Australia's Whistleblower Policy and the expectations and responsibilities regarding the management of modern slavery risks. All Virgin Australia direct employees are required to undertake annual training on the Code.

**96%**

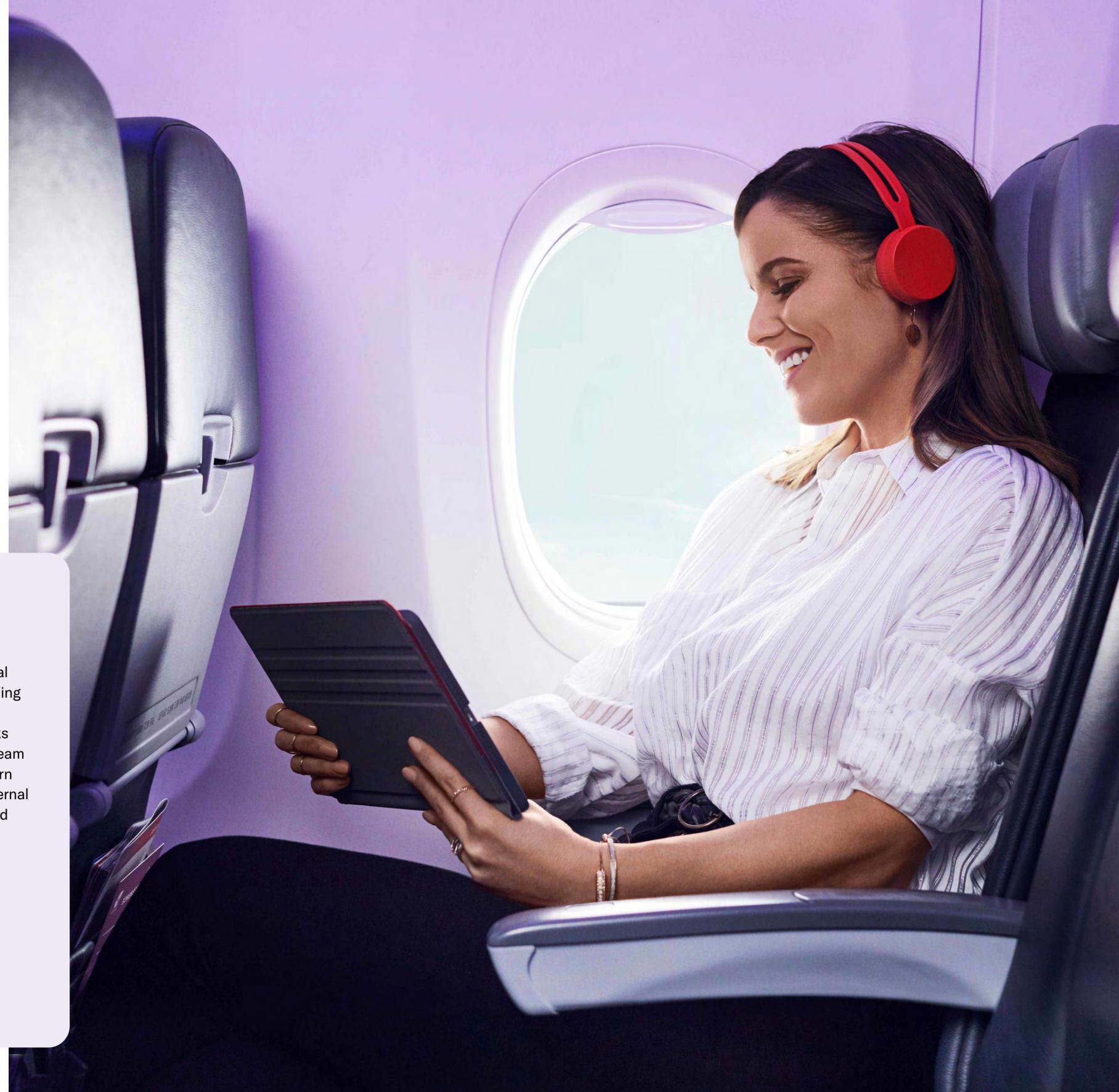
compliant in FY25

### Modern Slavery Component of Security Training

All Virgin Australia team members are required to undertake Security Awareness Training on a bi-annual basis. For most staff, this is an online module (excluding cabin or flight crew) and is designed to support our ambition of raising awareness of modern slavery risks across our operations and supply chain. It provides team members with a basic understanding of what modern slavery is, how to identify modern slavery and the internal reporting mechanisms to use when risks are identified or suspected incidents occur.

**3,000+**

Virgin Australia corporate and operational staff completed their initial or recurrent online security module in FY25.



## Face to face training

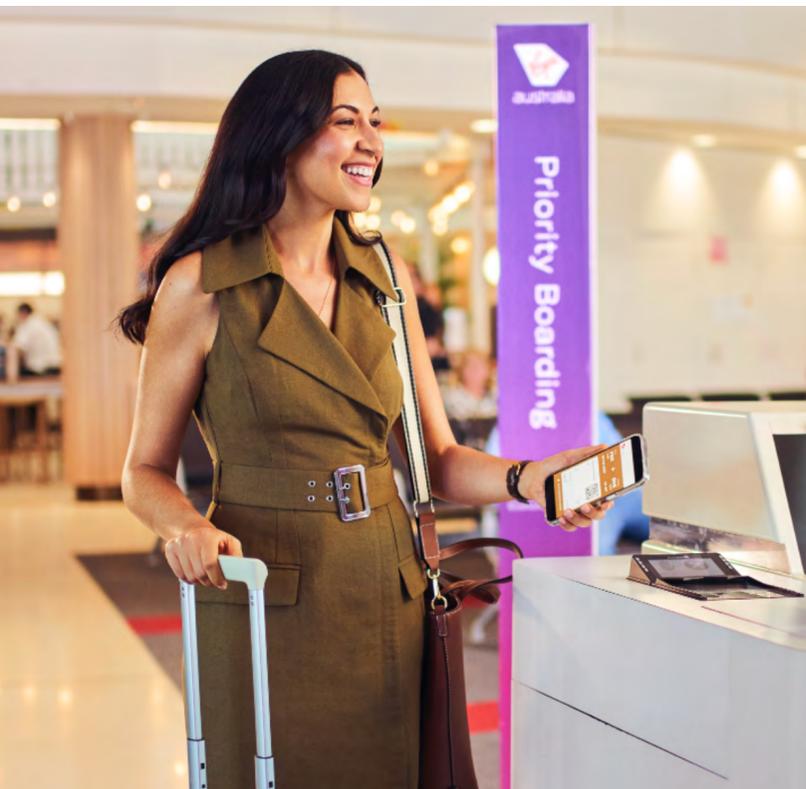
### Human trafficking training

Flight and cabin crew complete human trafficking training as part of their in-person Aviation Security Training course which is conducted upon induction, and every two years for recurrency. This training further builds on recognising the signs of human trafficking and what action to take if human trafficking is suspected.

During FY25, 1,872 Virgin Australia cabin and flight crew completed this in-person training, representing approximately 52% of the workforce which aligns with expectations given the bi-annual requirement.

### Targeted modern slavery training

The Procurement and Product teams completed targeted modern slavery training during the reporting period which was delivered by the Legal and Ethics and Compliance teams. The training content was tailored to the specific modern slavery risks relevant to their function. It provided an overview of modern slavery, insights on how to identify potential risks within Virgin Australia's supply chains, a summary of internal and external stakeholder expectations and practical steps for safely escalating concerns.

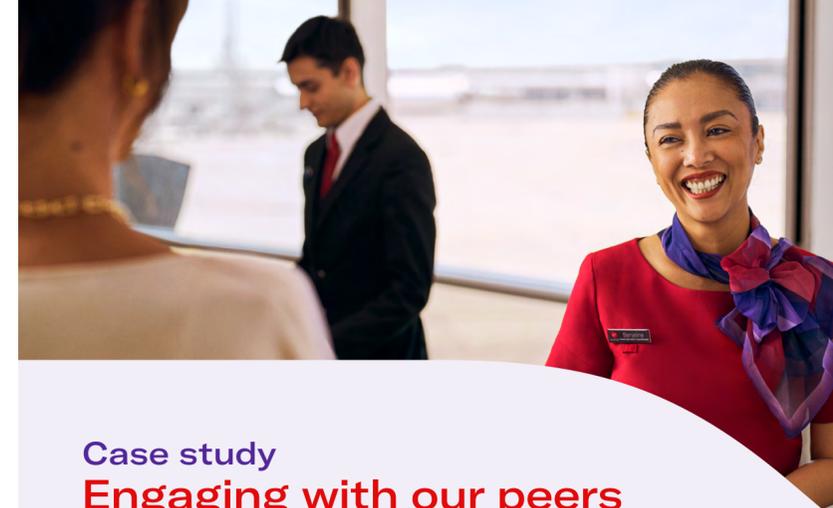


## Collaboration and engagement

We recognise that modern slavery is a complex, global issue that cannot be addressed by any one organisation alone. External stakeholder engagement and collaboration is therefore fundamental to our approach to identifying and addressing modern slavery risks. In FY25, we continued our engagement with peers, industry, government and civil society organisations to share lessons learnt, insights and explore opportunities for ongoing collaboration.

Across our case studies, a consistent theme has emerged: meaningful progress requires sustained engagement, tailored approaches, and a willingness to adapt. Whether through supplier Deep Dives, offshore contractor frameworks, or peer collaboration, we've seen that trust, transparency and shared learning are foundational to effective modern slavery risk management.

Engagement	Key stakeholders	Overview
<b>United Nations Global Compact Network Australia (UNGCNA)</b>	<b>Business and other stakeholders including civil society and government</b>	<p>Participation in the UNGCNA Business and Human Rights Accelerator program. The six-month program helped businesses across different industries and regions to move from commitment to action on human and labour rights through establishing ongoing human rights due diligence processes.</p> <p>During the program, Virgin Australia developed an Action Plan which brought together each of the key concepts learned. This included deepening our understanding of indicative human rights risks, identifying ways to build and use leverage with key stakeholders, defining the outcomes we aim to achieve, recognising the attitudes and behaviours that need to change, and developing methods to track the impact of our actions.</p>
<b>UNGCNA's Modern Slavery Community of Practice (MSCoP)</b>	Business and other stakeholders including civil society and government	Participation in the UNGCNA MSCoP provided us with an opportunity to learn from our peers and other stakeholders on issues related to modern slavery, including common challenges and key initiatives to address identified risks.
<b>Australian Federal Police (AFP)</b>	Government	We have regular dialogue with the Government and its agencies such as the AFP on a broad range of issues. During this reporting period, we commenced discussions with a Human Exploitation Community Officer from the AFP to discuss ways in which we can embed insights from their work into our existing ground crew training sessions.
<b>Modern Slavery Aviation Forum (MSAF)</b>	Airlines	Representatives from Virgin Australia, Qantas and Air New Zealand met during the reporting period to connect with the Anti-Slavery Commissioner and his team to discuss specific risks in aviation and potential collaborations.



### Case study Engaging with our peers through MSAF

Virgin Australia continues to participate in the Modern Slavery Aviation Forum (MSAF), established in 2024 alongside Qantas and Air New Zealand. The forum provides a trusted space for airlines to share learnings and discuss industry challenges in addressing modern slavery, within the boundaries of competition law. In 2025, the forum met three times, focusing on two key areas: (1) human trafficking, including approaches to training staff on identifying passengers who may be at risk and operational challenges in managing suspected cases at non-domestic ports; and (2) supplier due diligence effectiveness, including challenges around AI-generated responses and how to drive better understanding of risk. Members also engaged with the Australian Anti-Slavery Commissioner and his team to explore insights and experiences relevant to the sector.

### Looking forward

Virgin Australia also looks forward to exploring opportunities for cross-sector learning and collaboration, drawing on insights from other industries and forums. This may include:

- Participating in multi-stakeholder forums that bring together survivors, civil society, government and business to co-design solutions.
- Engaging with academic and research institutions to strengthen evidence-based approaches to risk identification and effectiveness measurement.
- Contributing to horizontal collaboration efforts across sectors (e.g. hospitality, logistics, retail) to share tools, training and supplier engagement strategies.
- Learning from survivor-led organisations and participatory research models to ensure our approach remains grounded in lived experience.

# Assessing effectiveness of our actions

We consider an effective modern slavery response to be one that enables us to identify, assess and mitigate modern slavery risks across our operations and supply chain in a transparent and collaborative manner. It also means using our influence to drive positive change within our supply chain and the communities where we operate and fly. Tracking effectiveness is a critical part of this approach and forms a key component of broader human rights due diligence, as outlined in the UNGPs, and is reflected in our Human Rights Policy.

We assess the effectiveness of our efforts to identify and address modern slavery risks through a range of activities, including:

- Reviewing and updating our policies and risk assessment processes to ensure they remain relevant, fit for purpose and aligned with our risk profile;
- Seeking advice and support from external experts in business and human rights;
- Engaging with external stakeholders such as industry peers, government agencies and civil society organisations to share insights and strengthen our approach; and
- Gathering regular feedback from internal stakeholders, including through the ESG Steering Committee and other engagement channels, to inform ongoing improvements.

Our Modern Slavery Framework helps guide how we track effectiveness, with defined key performance indicators (**KPIs**) across each of its elements. This structured approach helps us monitor progress, identify areas for improvement and ensure our actions are delivering meaningful outcomes. In this reporting period, we started the development of a tool to help us track progress against our KPIs relevant to modern slavery and other human rights focus areas. The aim of this tool is to support more consistent monitoring, strengthen internal and external reporting and enable us to better evaluate the impact of our efforts over time.

Modern Slavery Framework pillar	Governance	Management	Communication	Engagement	Grievance mechanisms, and remediation
<b>KPIs</b>	<ul style="list-style-type: none"> <li>• Engagement and review by the ELT and Board in relation to modern slavery risk management.</li> <li>• Number of relevant policies reviewed and updated.</li> </ul>	<ul style="list-style-type: none"> <li>• Number of suppliers screened for modern slavery related risks.</li> <li>• Number of supplier Drill Downs Framework assessments completed.</li> <li>• Engagement with suppliers on human rights related matters including related to modern slavery.</li> </ul>	<ul style="list-style-type: none"> <li>• Completion rates for general modern slavery awareness training.</li> <li>• Completion rates for targeted modern slavery training (e.g., relevant roles/functions).</li> </ul>	<ul style="list-style-type: none"> <li>• Number of external stakeholder engagements on modern slavery issues.</li> <li>• Duration of relationships with key external stakeholders.</li> <li>• Stakeholder feedback on modern slavery risk management approach.</li> </ul>	<ul style="list-style-type: none"> <li>• Number of modern slavery related concerns reported through our Ethics Hotline or other channels.</li> <li>• Number of modern slavery related concerns investigated and resolved.</li> <li>• Appropriate response and remediation provided to affected rightsholders where modern slavery impact identified.</li> </ul>
<b>FY25 progress</b>	<ul style="list-style-type: none"> <li>• Modern slavery discussed 7 times at ESG SteerCo and/or Board.</li> <li>• 3 policies relevant to modern slavery reviewed and updated.</li> </ul>	<ul style="list-style-type: none"> <li>• 467 third parties screened through KO3P platform.</li> <li>• 16 Drill Downs Framework assessments.</li> <li>• 1 supplier Deep Dive.</li> </ul>	<ul style="list-style-type: none"> <li>• Staff and contractors completed modern slavery awareness training.</li> <li>• 21 members of Procurement and Product team members completed targeted modern slavery training.</li> </ul>	<ul style="list-style-type: none"> <li>• 4 groups of external stakeholders engaged on modern slavery issues.</li> <li>• Engagement with various external stakeholders (e.g., government, civil society, government, academics).</li> <li>• Peer engagement and shared learning on our modern slavery response.</li> </ul>	<ul style="list-style-type: none"> <li>• 0 modern slavery-related concerns reported, investigated, resolved or remediated.</li> <li>• Matters involving potential indicators of human trafficking identified by our team were escalated to the Australian Federal Police (AFP) for further investigation, in line with our incident response protocols.</li> </ul>
<b>How this helps us to assess the effectiveness of our modern slavery response</b>	<p>The inclusion of modern slavery risk management in ELT and Board discussions helps demonstrate Virgin Australia's commitment to active oversight and accountability.</p> <p>Regular review of our policies and procedures enables us to understand whether they remain appropriate, relevant and aligned with evolving risks, while also helping to identify opportunities for further strengthening our approach.</p>	<p>Monitoring our supplier risk management processes helps us to understand how effectively modern slavery risks are being identified and assessed across our supply chain and enables us to identify where there may be gaps in our approach and opportunities to improve our due diligence processes.</p> <p>We also began enhancing our approach to supplier audit review, including embedding audit-related questions into our KO3P 2.0 process and expanding our expectations for high-risk suppliers to provide and engage on audit findings.</p>	<p>Monitoring completion rates for both general and targeted modern slavery training helps us assess awareness levels across the business and understand how well team members are equipped to identify and manage modern slavery risks.</p>	<p>Engaging with external stakeholders helps us gather diverse perspectives on our modern slavery response, identify areas for improvement and explore opportunities to work collaboratively on shared challenges.</p>	<p>Monitoring the number of modern slavery-related concerns received can serve as an indicator of the effectiveness of our grievance mechanisms in enabling stakeholders to raise concerns. It also helps us identify patterns or emerging areas of risk, allowing us to integrate these insights into our broader modern slavery and human rights due diligence processes. Where an incident has been confirmed, monitoring to ensure that any responses are appropriate and effective.</p>

# Looking forward

The modern slavery regulatory and policy landscape continues to evolve, particularly as the Australian Government progresses its consultations on the Act. Over the coming year, we will continue to closely monitor regulatory developments and stakeholder expectations, and remain committed to continuously improving our modern slavery risk management approach.

As we look ahead, we remain mindful of the Australian Government's ongoing consultation on reforms to the Act. We will continue to monitor these developments and update our approach accordingly.

We also acknowledge that addressing modern slavery and making meaningful progress to eradicate this harmful practice requires collaboration across industries and stakeholder groups. As we look to improve how we address modern slavery risks, we have set out the following priorities for the coming year:



## Governance

- Deliver a strategic modern slavery Board briefing for VAH and VAIH Board members.
- Develop a three-year strategic roadmap for modern slavery risk management, aligned with anticipated regulatory reforms and stakeholder expectations.



## Communication

- Explore opportunities to enhance training and awareness programs, including consideration of language needs relevant to offshore contractor locations.
- Continue to review and update training content for all relevant roles, and seek to incorporate insights from law enforcement and industry partners where appropriate.
- Deliver in-person training in Perth to representatives from VARA.



## Engagement

- Engage with survivor-led organisations and multi-stakeholder forums to inform due diligence efforts, training and general program design.
- Participate in cross-sector pilots and share learnings, such as uniform supply chain due diligence, to strengthen supplier engagement and contracting practices.
- Continue active participation in industry partnerships, including MSAF, MSCOP, ATIA, and policy discussions.
- Participate in policy discussions on proposed updates to the Act and other issues related to responsible business conduct.



## Grievance mechanisms & remediation

- Promote our updated Modern Slavery Incident Response and Remediation Policy to key stakeholders across the business.
- Enhance our Speak Up program by improving our reporting, case management and investigation capabilities.



## Management

- Build on the outcomes from the cleaning supplier Deep Dive (see page 20-21), and explore opportunities for collaboration with the supplier on a joint initiative to address modern slavery risk.
- Conduct a Deep Dive with a supplier from an identified high-risk category.
- Continue to promote the updated Supplier Code of Conduct and Supplier Commitments with our supplier base.
- Deepen our understanding of potential modern slavery risks related to VARA by conducting a site visit to assess operational and supply chain risks, including related to FIFO charter services.
- Continue to develop and roll out the modern slavery and broader human rights performance tracking tool.
- Explore cross-sector learnings from managing high-risk categories to inform future enhancements to our due diligence approach.
- Expand our expectations for high-risk suppliers to provide independent audit findings and engage with us on identified risks or improvement opportunities, as part of onboarding and ongoing due diligence.
- Conduct a review of our supplier segmentation to ensure we are prioritising the key areas of modern slavery risk within our supply chain.



# Annexure One

## Overview of reporting entities

The following table provides an overview of the reporting entities covered by this Statement, each of which are incorporated in Australia.

PART A		
Reporting Entity	Principal Activities	Brands
<b>Virgin Australia Holdings Limited (ABN 54 100 686 226)</b>	Virgin Australia Holdings Limited is the parent entity of the reporting entities set out in Part A of Appendix One. The principal activities of the Group were the provision of domestic airline services, charter services and a frequent flyer loyalty program, as well as managing the provision of short haul international services.	<b>Virgin Australia, Virgin Australia Regional Airlines, Virgin Australia Cargo, Velocity Frequent Flyer</b>
<b>VBNC5 Pty Ltd (ABN 16 119 691 502)</b>	The principal activity of the company was that of a holding company.	<b>Virgin Australia, Virgin Australia Regional Airlines, Virgin Australia Cargo, Velocity Frequent Flyer</b>
<b>VB PDP 2010-11 Pty Ltd (ABN 88 140 818 266)</b>	The principal activity of the company was that of a holding company.	<b>Virgin Australia, Virgin Australia Regional Airlines, Virgin Australia Cargo, Velocity Frequent Flyer</b>
<b>BC Hart Company Pty Ltd (ABN 65 645 265 514)</b>	The principal activity of the company was that of debt financing and a holding company.	<b>Virgin Australia, Virgin Australia Regional Airlines, Virgin Australia Cargo, Velocity Frequent Flyer</b>
<b>Virgin Australia Airlines Holdings Pty Ltd Limited (ABN 19 093 924 675)</b>	The principal activity of the company was that of a holding company.	<b>Virgin Australia, Virgin Australia Regional Airlines, Virgin Australia Cargo, Velocity Frequent Flyer</b>
<b>Virgin Australia Airlines Pty Ltd (ABN 36 090 670 965)</b>	The principal activity of the company was to provide domestic passenger air transportation services.	<b>Virgin Australia</b>
<b>Virgin Australia Regional Airlines Pty Ltd Limited (ABN 76 008 997 662)</b>	The principal activity of the company was the provision of aviation charter services in Australia.	<b>Virgin Australia Regional Airlines</b>
<b>Velocity Frequent Flyer Holdco Pty Ltd (ABN 44 169 684 093)</b>	The principal activity of the company was that of a holding company.	<b>Velocity Frequent Flyer</b>
<b>Velocity Frequent Flyer 1 Pty Ltd (ABN 50 601 273 072)</b>	The principal activity of the company was that of a holding company.	<b>Velocity Frequent Flyer</b>
<b>Velocity Frequent Flyer 2 Pty Ltd (ABN 54 601 273 527)</b>	The principal activity of the company was that of a holding company.	<b>Velocity Frequent Flyer</b>
<b>Velocity Frequent Flyer Pty Ltd (ABN 60 601 408 824)</b>	The principal activity of the company was to manage and operate our frequent flyer loyalty program.	<b>Velocity Frequent Flyer</b>
PART B		
<b>Virgin Australia International Holdings Pty Ltd (ABN 23 155 860 021)</b>	Virgin Australia International Pty Ltd is the parent entity of the reporting entities set out in Part B of Appendix One. The principal activity of the company was that of a holding company.	<b>Virgin Australia International</b>
<b>Virgin Australia International Airlines Pty Ltd (ABN 63 125 580 823)</b>	The principal activity of the company was to provide international short haul passenger air transportation services.	<b>Virgin Australia International</b>

# Annexure Two

## Mandatory reporting criteria

This Statement was prepared to meet the mandatory reporting criteria set out under the Act. The table below identifies where each criterion of the Act is disclosed within sections of this Statement.

Modern Slavery Act Mandatory Criteria	Reference in this statement
Identify the reporting criteria	Pages 4, 28
Describe the reporting entity's structure, operations and supply chain entity	Pages 8-11
Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity, and any entities that the reporting entity owns or controls	Pages 12-14
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Pages 15-25
Describe how the reporting entity assesses the effectiveness of such actions	Page 26
Describe the process of consultation with any entities that the reporting entity owns or controls	Pages 4
Any other information that the reporting entity considers relevant	Page 3 (A message from the CEO)



## Disclaimer & forward-looking statements

Forward-looking statements may include statements regarding the future progress of Virgin Australia's modern slavery program; our commitment to modern slavery reporting, frameworks, standards and initiatives; and our commitments to achieve certain targets and outcomes with respect to modern slavery and compliance issues.

Forward-looking statements may also refer to the actions of third parties, and external contributors such as technology development and commercialisation, policy support, market support, and energy and offsets availability.

Forward looking statements may be identified by the use of terminology including, but not limited to, 'intend', 'aim', 'ambition', 'aspiration', 'goal', 'target', 'project', 'see', 'anticipate', 'estimate', 'plan', 'objective', 'believe', 'expect', 'commit', 'may', 'should', 'need', 'must', 'will', 'would', 'continue', 'forecast', 'guidance', 'trend' or similar words. These statements discuss future expectations concerning performance or provide other forward-looking information.

The forward-looking statements in this report are based on management's current expectations and reflect judgements, assumptions, estimates and other information available as at the date of this plan, report and/or the date of Virgin Australia's planning processes or scenario analysis processes. These statements do not represent guarantees or predictions of future financial or operational performance and involve known and unknown risks, uncertainties and other factors, many of which are beyond Virgin Australia's control, and which may cause actual results and performance to differ materially from those expressed in the statements contained in this report. Virgin Australia cautions against reliance on any forward-looking statements or guidance contained in this statement. Virgin Australia further disclaims any duty or undertaking, except to the extent required by law, to release publicly any updates to any forward-looking statement.



australia  
group